

# **Greenhouse Gas Impact Analysis**

## **Midway Rising Project**

**March 2025**

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## ***Acronyms and Abbreviations***

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°F	degrees Fahrenheit
2008 General Plan	2008 City of San Diego General Plan
2018 Community Plan	2018 Midway-Pacific Highway Community Plan
AB	Assembly Bill
APN	Assessor's Parcel Number
CAP	Climate Action Plan
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CH <sub>4</sub>	methane
City	City of San Diego
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
COVID-19	Coronavirus Disease 2019
CPU	Community Plan Update
EO	Executive Order
EV	electric vehicle
GHG	greenhouse gas
LCFS	Low Carbon Fuel Standard
LED	light-emitting diode
LEV III	Low Emission Vehicle III Standards
Midway-Pacific Highway CPU PEIR	Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report
MMT	million metric tons
MPO	Metropolitan Planning Organization
MT	metric ton
MTS	San Diego Metropolitan Transit System
N <sub>2</sub> O	nitrous oxide
NF <sub>3</sub>	nitrogen trifluoride
O <sub>3</sub>	ozone
PEIR	Program Environmental Impact Report
Project	Midway Rising Project
ROW	right-of-way
SANDAG	San Diego Association of Governments
SB	Senate Bill
Scoping Plan	Climate Change Scoping Plan
SCS	Sustainable Communities Strategy
SDMC	San Diego Municipal Code
SF <sub>6</sub>	sulfur hexafluoride
Specific Plan	Midway Rising Specific Plan
TPA	Transit Priority Area
USEPA	U.S. Environmental Protection Agency

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## ***Executive Summary***

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This report assesses the potential greenhouse gas (GHG)-related impacts associated with construction and operation of land uses proposed in the Midway Rising Project (Project), which would involve demolition of existing site development and construction and operation of a new entertainment center and mixed-use residential and commercial land uses. This analysis presents an evaluation of the environmental setting in the region; thresholds of significance, methods, and assumptions; and potential impacts, including cumulative impacts, associated with the construction and operation of the Project. This report analyzes the Project's consistency with the City of San Diego's (City's) 2022 Climate Action Plan (CAP). As shown, the Project would be consistent with applicable plans to reduce GHG emissions and would not result in a significant impact related to GHG emissions.

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# Section 1 Introduction

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## 1.1 Purpose of the Report

This greenhouse gas (GHG) impact analysis was prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). The proposed Midway Rising Project (Project) is evaluated to assess if any potentially significant impacts related to GHG emissions are likely to occur in conjunction with those proposed by the Project above and beyond the impacts identified for the Project site in the 2018 Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report (Midway-Pacific Highway CPU PEIR).

## 1.2 Project Location and Description

### 1.2.1 Project Location

The Project site is in the northernmost section of the Midway-Pacific Highway Community in San Diego, California. The Project site is south of Mission Bay; west of Mission Valley, Old Town, and Mission Hills; north of Liberty Station and the San Diego International Airport; and east of Ocean Beach and Point Loma. The Project site encompasses approximately 49.23 acres of developed land and is generally bounded by Kurtz Street to the north, Sports Arena Boulevard to the south, Hancock Street to the northwest, and commercial development to the west and east, approximately aligned east of Greenwood Street. The Project site includes the City of San Diego (City)-owned San Diego International Sports Arena (currently named Pechanga Arena) site (Assessor's Parcel Number [APN] 441-590-04). Street addresses on the Project site include 3220, 3240, 3250, 3350, and 3500 Sports Arena Boulevard. Regional transit corridors include Interstate 8 to the north, Interstate 5 to the east, and the Old Town Transit Center offering bus and rail service (COASTER, Amtrak, and San Diego Metropolitan Transit System [MTS] trolley) approximately 0.70 to 1 mile northeast of the Project. Refer to Figures 1 through 3.

The Project site is currently developed with the San Diego International Sports Arena, SOMA San Diego music venue, asphalt surface parking lots, a gasoline service station, restaurants, a lumber and home store, a thrift store, and various commercial/retail businesses.

### 1.2.2 Previous Environmental Analysis

In 2018, the Midway-Pacific Highway CPU PEIR was certified. The Midway-Pacific Highway CPU PEIR analyzed environmental impacts associated with the 2018 Midway-Pacific Highway Community Plan (2018 Community Plan), including policies and recommendations of the 2018 Community Plan, addressing multimodal mobility, urban design, environmental conservation, recreation opportunities, neighborhood character, and historic preservation, in accordance with the goals stated in the 2008 City of San Diego General Plan (2008 General Plan). The Midway-Pacific Highway

CPU PEIR analyzed the redevelopment of the Project site with commercial retail, office, and residential uses with and without the San Diego International Sports Arena.

This report was prepared in support of a Subsequent EIR that evaluates the potential for the Project to trigger new significant impacts and/or more severe impacts than those identified in the Midway-Pacific Highway CPU PEIR. This analysis tiers from the analysis for GHG impacts in the Midway-Pacific Highway CPU PEIR. Tiering refers to using the analysis of general matters contained in a broader EIR with later EIRs on narrower projects, incorporating by reference the general discussions from the broader EIR, and concentrating the later EIR solely on the issues specific to the later project.

### **1.2.3 Project Description**

The Project proposes to redevelop the site with a mix of uses including entertainment, retail, restaurant, residential, recreational, public, and park uses. Flexible zoning would allow for construction of a new on-site entertainment center or retention of the existing arena in its current location.

The Project would include the approval and implementation of the Midway Rising Specific Plan (Specific Plan), which provides guidance and direction on land use, development standards, site planning, building design, and landscape design and centers on five key elements: housing, parks and public space, entertainment, retail, and mobility. The Specific Plan would satisfy and incorporate the 2018 Community Plan's Supplemental Development Regulations to ensure that it furthers the 2018 Community Plan's vision for the site.

The Project would include up to 4,524 housing units, including affordable units, to provide a variety of housing opportunities and contribute toward improving housing affordability in the City. A central organizing element would be a network of parks and public spaces consisting of approximately 14.54 acres that connects all the key land uses with each other and to the surrounding community. It is anticipated that outdoor events could be held within the parks and public space areas on the Project site. An example of how the parks and public space network could be developed is shown on Figure 4, Illustrative Conceptual Site Map. Figure 4 shows an example for illustrative purposes only of how the park and public space network could be developed.

Land uses in the Specific Plan would be designated Community Village (zero to 72 dwelling units per acre), zoned Residential Mixed-Use (RMX-2), and divided into two phases (refer to Figure 5, Land Use Map). Phase 1 would be east of planned roadway Frontier Drive, and Phase 2 would be west of Frontier Drive.

The Specific Plan allows for entertainment uses across the entire Specific Plan Area and for the development of a multipurpose entertainment center that may host a range of activities. Consistent with the Project-specific Local Mobility Analysis prepared by Kimley-Horn Associates (2024), the analysis assumes that a new 380,550-square-foot, 16,000-seat entertainment center could be constructed and offer over 166 events per year, including but not limited to performing arts such as

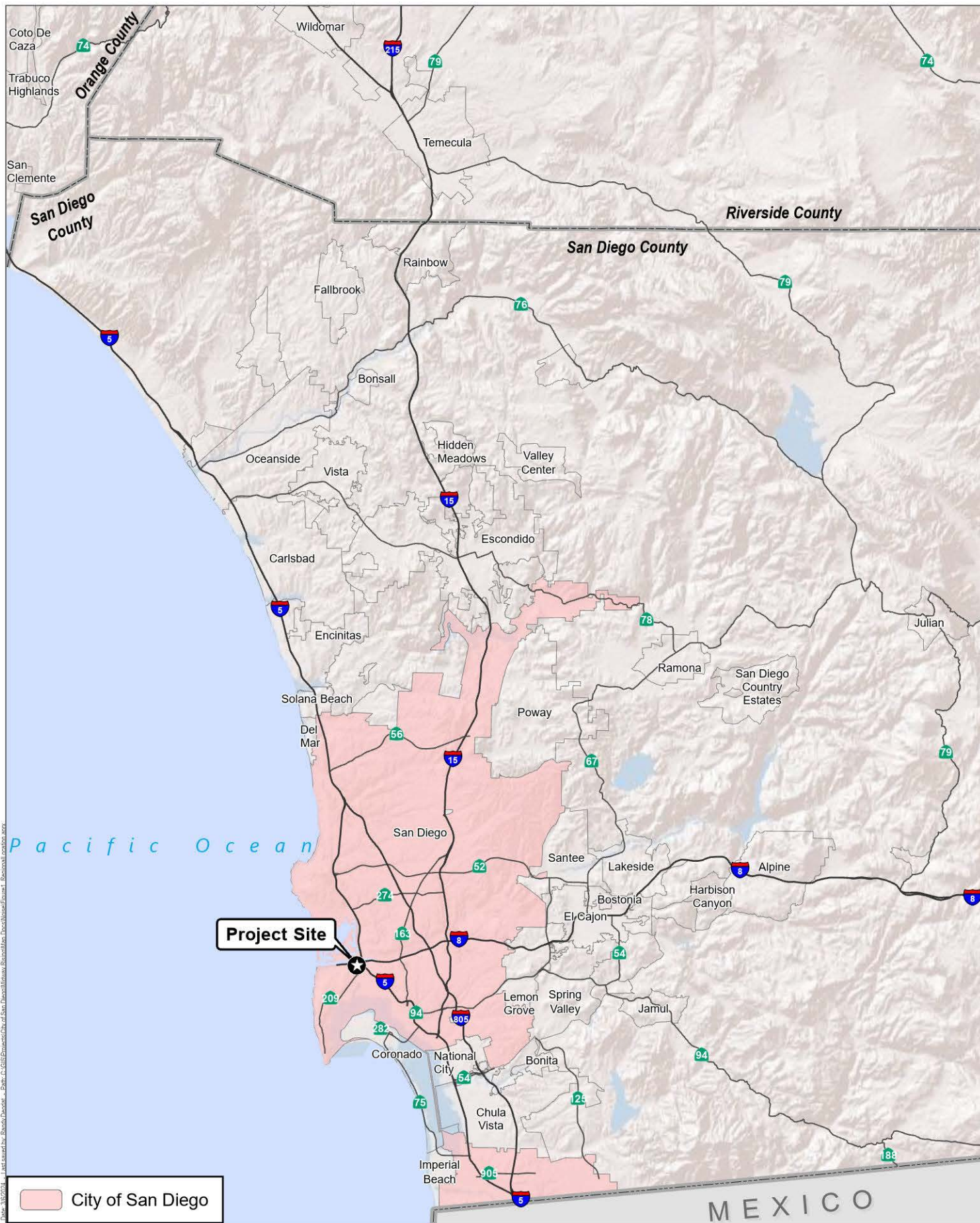
concerts, family shows, sporting events, motor sports, comedy, and musical and artistic entertainment productions. The maximum event capacity for the Project site would be approximately 20,000 attendees, which could involve of combination of Project indoor and outdoor venues.

Mobility within the Project site would be improved with the Project's construction of a multimodal circulation network of new and modified roadways, sidewalks, promenades, multi-use urban paths, and bicycle and pedestrian facilities. The Project would include on- and off-site mobility improvements to provide connections to the surrounding community and transit. The Specific Plan includes design standards for circulation, parking, buildings, and landscape to ensure that future development projects are implemented consistent with applicable design goals.

Sustainability would be an integral part of the Project, focusing on sustainable design and Smart Growth to meet the City's 2022 Climate Action Plan (CAP) goals. The Project would be in a geographic center of the City near and connected to transportation, jobs, housing, and regional open space.

The Project would include infrastructure improvements on the Project site and surrounding off-site areas, including extensions and/or upgrades of existing water, sewer, storm drain, drainage, roadways, bike facilities, transit, and pedestrian facilities. Heating, ventilation, and air conditioning equipment is anticipated to be located in a mechanical yard on the northern side of the proposed entertainment center. Frontage and off-site transportation improvements would be required within the Sports Arena Boulevard and Kurtz Street public rights-of-way (ROWs) for new multi-use urban paths, and on several roadway intersections within the Project vicinity.

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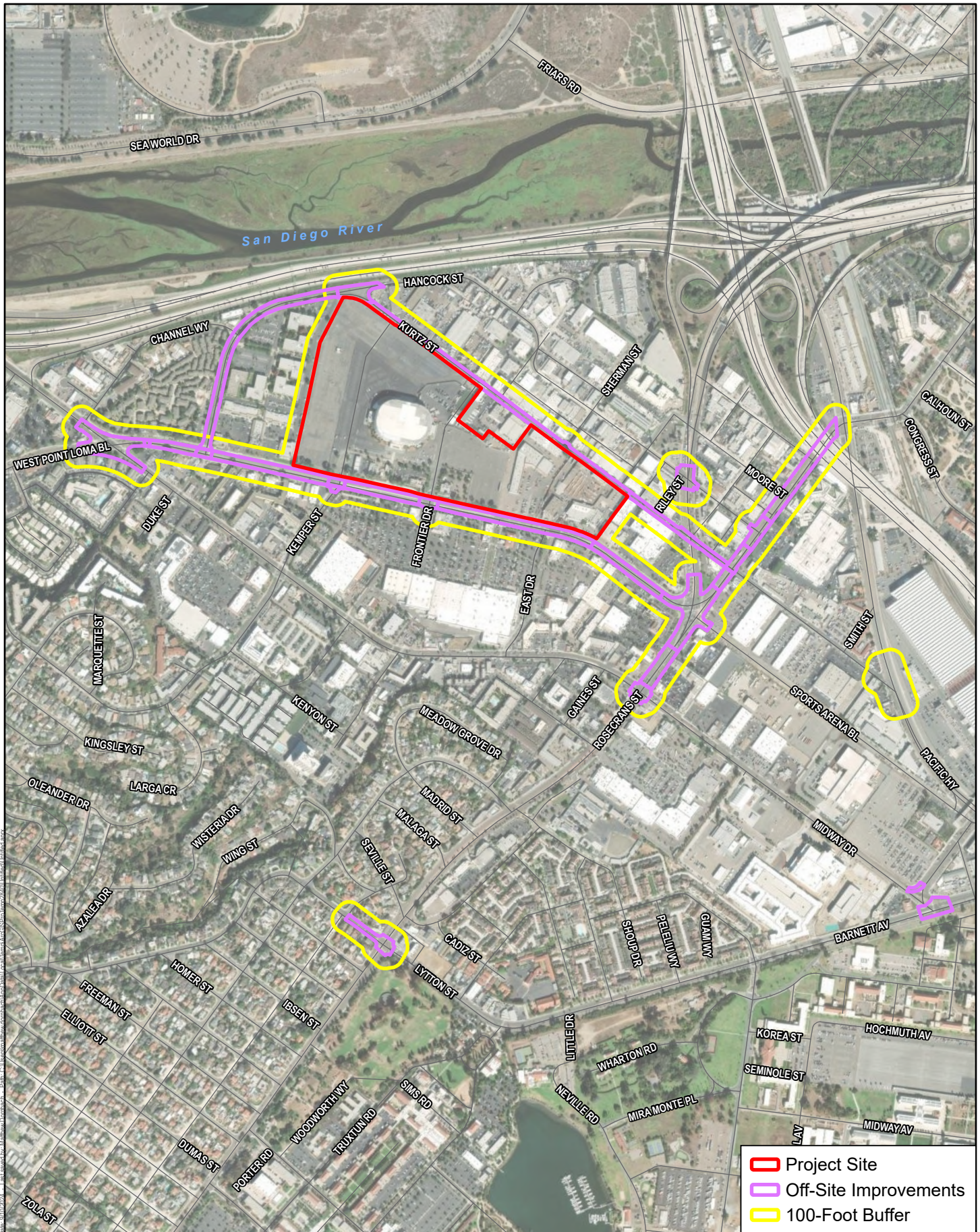
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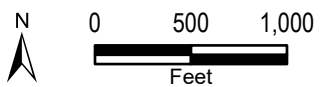
**Figure 1**  
 Regional Location  
 Midway Rising

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Source: Maxar Imagery 2022.



**Figure 2**  
 Project Location  
 Midway Rising



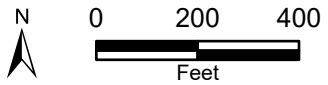
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 Project Site

Source: Maxar Imagery 2022.



**Figure 3**  
Existing Site Uses  
Midway Rising

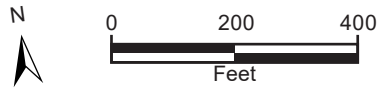
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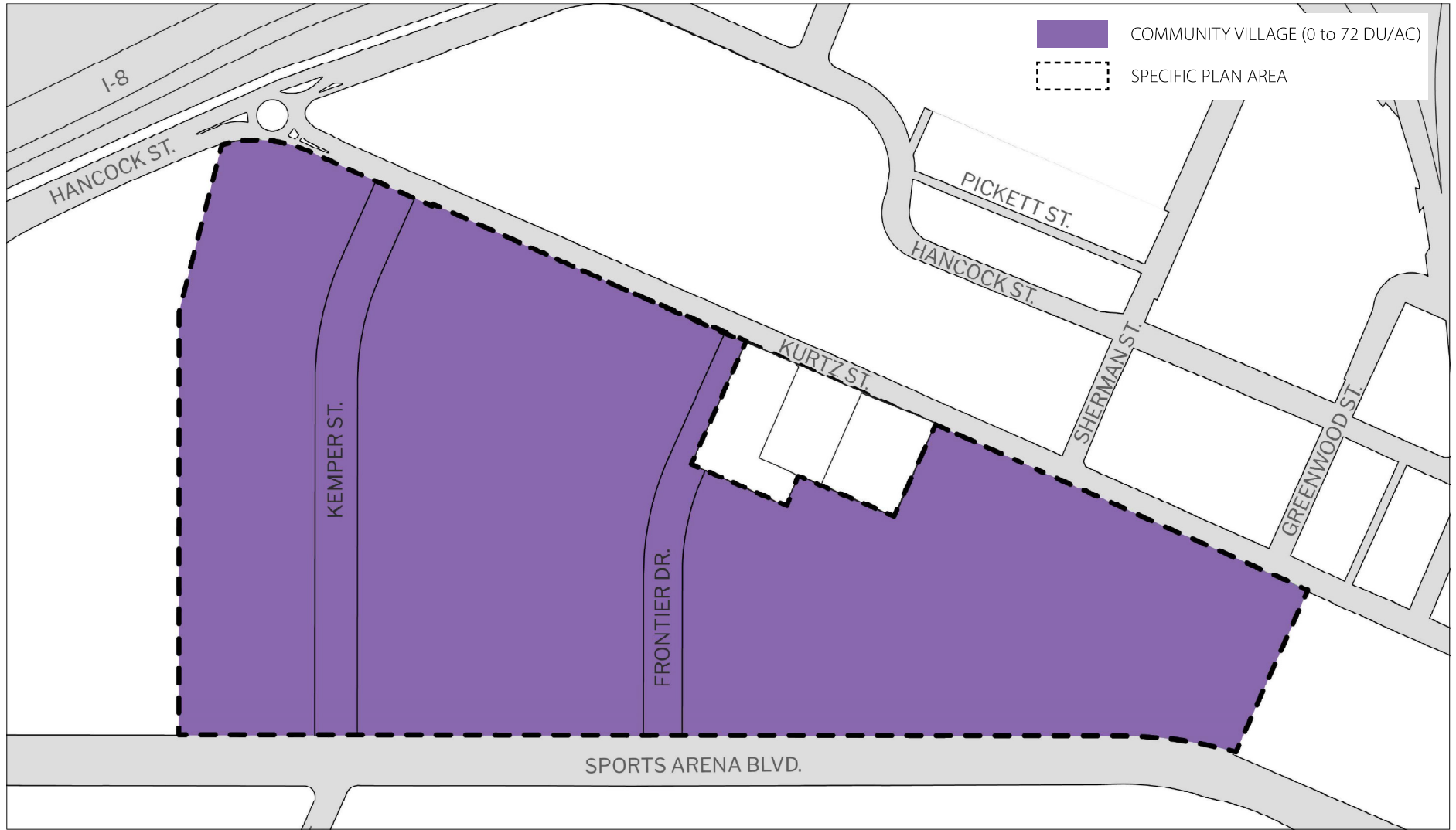
- A "THE GREEN"
- B "THE SQUARE"
- C "THE PLAZA"
- D PROMENADES
- E STREETSCAPES
- F PASEO GREENS
- G PASEO GREENWAYS
- H RESIDENTIAL BUFFER

Source: CityThinkers 2024.

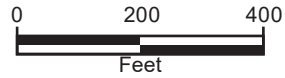


**Figure 4**  
Site Concept Illustrative Map

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Source: CityThinkers 2024.



**Figure 5**

Land Use Map

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## Section 2 Environmental Setting

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### 2.1 Global Climate Change Overview

Climate change refers to any substantial change in measures of climate (such as temperature, precipitation, or wind) lasting for decades or longer. According to the U.S. Environmental Protection Agency (USEPA), Earth's climate has changed many times during the planet's history, including events ranging from ice ages to long periods of warmth. Historically, natural factors such as volcanic eruptions, changes in Earth's orbit, and the amount of energy released from the sun have affected Earth's climate. Some GHGs, such as water vapor, occur naturally and are emitted to the atmosphere through natural processes, while others are emitted through human activities. Since the late 18th century, human activities associated with the Industrial Revolution have changed the composition of the atmosphere and, therefore, are very likely influencing Earth's climate. For more than 200 years, the burning of fossil fuels, such as coal and oil, and deforestation have caused concentrations of heat-trapping GHG to increase substantially in the atmosphere.

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without it, the temperature of Earth would be about zero degrees Fahrenheit (°F) instead of its current 57°F (NOAA 2023). Global climate change concerns focus on whether human activities are leading to an enhancement of the greenhouse effect.

### 2.2 Greenhouse Gases

GHGs include but are not limited to carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone (O<sub>3</sub>), water vapor, fluorinated gases (hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride [SF<sub>6</sub>], and nitrogen trifluoride [NF<sub>3</sub>]), chlorofluorocarbons, and hydrochlorofluorocarbons. Some GHGs, such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, and SF<sub>6</sub>, which are associated with certain industrial products and processes.

CO<sub>2</sub> enters the atmosphere through the burning of fossil fuels, solid waste, trees, and wood products and other chemical reactions, such as those that occur in cement manufacturing. Globally, the largest source of anthropogenic CO<sub>2</sub> emissions is the combustion of fossil fuels in power plants, automobiles, industrial facilities, and other similar sources. CH<sub>4</sub> is emitted from a variety of both natural and human-related sources, including fossil fuel production, animal husbandry, and waste management. N<sub>2</sub>O is emitted during agricultural and industrial activities, during combustion of fossil fuels and solid waste, and wastewater treatment (USEPA 2025a). Hydrofluorocarbons, perfluorocarbons, and SF<sub>6</sub> are synthetic, powerful GHGs emitted from a variety of industrial processes and the production of chlorodifluoromethane. Construction and operation of the Project would not include any industrial

processes, and chlorodifluoromethane has been mostly phased out of use in the United States (USEPA 2025a); therefore, these GHGs are not discussed further in this analysis.

Individual GHGs have varying heat-trapping properties and atmospheric lifetimes. The carbon dioxide equivalent (CO<sub>2</sub>e) is a consistent methodology for comparing GHG emissions because it normalizes various GHG emissions to a consistent measure based on their global warming potential. Each GHG is compared to CO<sub>2</sub> with respect to its ability to trap infrared radiation, its atmospheric lifetime, and its chemical structure. For example, the global warming potential for CH<sub>4</sub> is 25 (which means that emissions of 1 metric ton (MT) of CH<sub>4</sub> are equal to emissions of 25 MT CO<sub>2</sub>) and for N<sub>2</sub>O is 298 (CAPCOA 2022).

## **2.3 Potential Effects of Human Activity on Climate Change**

As detailed in the City's 2022 CAP, the effects of climate change include increased risk for extreme weather events such as heat waves, droughts, and rainstorms. These extreme weather events can disrupt the supply chain and food systems, put pressure on the supply of fresh water, result in more days with poor air quality, and increase the risk of wildfire. Risks also include increased flooding, sea-level rise, and extreme coastal storm and rain events. In the San Diego region specifically, a predicted trend of warming and drying is anticipated to result in more heat waves, warmer nights, and more variability in precipitation, leading to extreme rainfall or extended periods of drought. The typical sources of GHG emissions also result in emissions of additional pollutants or have compounding effects, including severe impacts on air quality and public health. For example, typical sources of GHG emissions, such as diesel-powered vehicles, are also sources of particulate matter emissions, which have been a pollutant of concern that has impacted the health of San Diego residents for decades (City of San Diego 2022a).

## **2.4 Federal, State, and Local Greenhouse Gas Inventories**

To evaluate and reduce the potential adverse impact of climate change, federal, state, and local organizations conducted GHG inventories to estimate levels of and trends in GHG emissions and removals. The following summarizes these GHG inventories.

### **2.4.1 Federal**

The USEPA's Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021 provides a comprehensive emissions inventory of the nation's primary anthropogenic sources and sinks of GHGs. Total U.S. GHG emissions in 2021 were 6,340.2 million metric tons (MMT) of CO<sub>2</sub>e, a 5.2 percent increase from 2020. This increase is primarily due to an increase in CO<sub>2</sub> emissions from fossil fuel combustion due to economic activity rebounding after the height of the Coronavirus Disease 2019 (COVID-19) pandemic. Previous inventories reflected a sharp decline in emissions from 2019 to 2020 due to the impacts of the COVID-19 pandemic on travel and other economic activity. Emissions from transportation activities, in total, accounted for the largest portion (28.5 percent) of



total U.S. GHG emissions in 2021. Electric power generation accounted for the second largest portion (25 percent), while emissions from industry accounted for the third largest portion (23.5 percent) of total U.S. GHG emissions in 2021. Emissions from industry have, in general, declined over the past decade due to several factors, including structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and energy efficiency improvements. The remaining U.S. GHG emissions were contributed by, in order of magnitude, the agricultural, commercial, and residential sectors (USEPA 2025b).

## **2.4.2 State**

According to California's 2000–2020 GHG emissions inventory (CARB 2022a), California emitted 369.2 MMT CO<sub>2</sub>e in 2020, including emissions resulting from out-of-state electrical generation. Sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high global warming potential substances, and recycling and waste. The transportation sector remains the largest source of GHG emissions in the state. Direct emissions from vehicle tailpipes, off-road transportation sources, and intrastate aviation accounted for almost 40 percent of statewide emissions in 2020. Emissions from the electric power sector made up 16 percent of 2020 statewide GHG emissions. Between 2001 and 2020, per-capita GHG emissions in California dropped from a peak of 13.8 MT CO<sub>2</sub>e per person in 2001 to 9.3 MT CO<sub>2</sub>e per person in 2020, representing a 33 percent decrease. Although emissions in California have generally decreased since 2004, the 35.3 MMT CO<sub>2</sub>e decrease in emissions from 2019 to 2020 is likely due in large part to the impacts of the COVID-19 pandemic, like the federal emissions inventory. Economic recovery from the pandemic may result in emissions increases over the next few years that will be reflected in future inventories (CARB 2022a).

## **2.4.3 Local**

In December 2015, the City adopted a CAP, which was comprehensively updated in 2022 (City of San Diego 2022a). The 2022 CAP includes an inventory of the City's GHG emissions for 2019. The City's GHG emissions source categories and their relative contributions in 2019 are presented in Table 1, 2019 Greenhouse Gas Emissions Sources in the City of San Diego.

**Table 1. 2019 Greenhouse Gas Emissions Sources in the City of San Diego**

<b>Source Category</b>	<b>Annual GHG Emissions (MMT CO<sub>2</sub>e)</b>	<b>Percentage of Total<sup>1</sup></b>
Transportation	5.805	55%
Electricity	2.375	23%
Natural Gas	1.911	18%
Solid Waste	0.277	3%
Construction Equipment	0.070	1%
Water	0.068	1%
Wastewater	0.026	<1%
<b>Total</b>	<b>10.532</b>	<b>100%</b>

**Source:** City of San Diego 2022a.

**Notes:** CO<sub>2</sub>e = CO<sub>2</sub> equivalent; MMT CO<sub>2</sub>e = million metric tons

<sup>1</sup> Percentage of total has been rounded, and total may not sum due to rounding.

## **2.5 Regulatory Framework**

The following describes the federal, state, regional, and local planning framework and regulatory documents, plans, and policies relevant to the Project’s GHG emissions.

### **2.5.1 Federal**

The following summarizes the federal regulations relevant to the Project’s GHG analysis.

#### **2.5.1.1 Federal Clean Air Act**

On April 2, 2007, the U.S. Supreme Court ruled in *Massachusetts v. USEPA* that CO<sub>2</sub> is an air pollutant, as defined under the Clean Air Act, and that the USEPA has the authority to regulate GHGs emissions. The USEPA announced that GHGs (including CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, hydrofluorocarbons, perfluorocarbons, and SF<sub>6</sub>) threaten the public health and welfare of the American people. This action was a prerequisite to finalizing the USEPA’s GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the U.S. Department of Transportation’s National Highway Traffic Safety Administration. The standards have continued to be updated to include additional standards for future vehicle model years regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In December 2021, the USEPA finalized revised national GHG emissions standards for passenger cars and light trucks for model years 2023–2026.

### **2.5.2 State**

The following describes the state regulations relevant to the Project’s GHG analysis.

### **2.5.2.1 Executive Order S-3-05**

On June 1, 2005, California Governor Arnold Schwarzenegger announced the following statewide GHG emissions reduction targets in Executive Order (EO) S-3-05:

- By 2010, California shall reduce GHG emissions to 2000 levels.
- By 2020, California shall reduce GHG emissions to 1990 levels.
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

The emissions targets established in EO S-3-05 have been codified and updated as described below.

### **2.5.2.2 Assembly Bill 32**

In September 2006, the California Legislature adopted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 focused on reducing GHG emissions in California. GHGs, as defined under AB 32, include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, and SF<sub>6</sub>. Under AB 32, the California Air Resources Board (CARB) has the primary responsibility for reducing GHG emissions and works with the California Climate Action Team to coordinate statewide efforts and promote strategies that can be undertaken by many other California agencies. AB 32 required CARB to adopt rules and regulations that would achieve GHG emissions equal to statewide levels in 1990 by 2020.

### **2.5.2.3 2022 Climate Change Scoping Plan**

As directed by AB 32, CARB adopted the first Climate Change Scoping Plan (Scoping Plan) in December 2008, in accordance with California Health and Safety Code Section 38561. The Scoping Plan included measures to address GHG emissions reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The most recent update to the Scoping Plan was adopted by CARB in December 2022 (2022 Scoping Plan). The 2022 Scoping Plan assesses progress toward the statutory 2030 target of at least 40 percent below 1990 emissions and identifies a path to achieving carbon neutrality by 2045 (CARB 2022b).

### **2.5.2.4 Senate Bill 32**

Effective January 1, 2017, Senate Bill (SB) 32 added Section 38566 to the California Health and Safety Code. SB 32 provides that “in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions authorized by [Division 25.5 of the California Health and Safety Code], [CARB] shall ensure that statewide greenhouse gas emissions are reduced to at least 40 percent below the statewide greenhouse gas emissions limit no later than December 31, 2030.” In other words, SB 32 requires California to reduce its statewide GHG emissions by the year 2030 so that emissions are 40 percent below those that occurred in 1990.

### **2.5.2.5 Assembly Bill 1279**

AB 1279, the California Climate Crisis Act, enacted in September 2022, updated the goals of AB 32. The bill established a statewide goal to achieve net-zero GHG emissions by 2045 and to achieve and maintain net-negative GHG emissions thereafter. Additionally, the bill established a specific target for statewide anthropogenic GHG emissions to be reduced to at least 85 percent below the 1990 levels by 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable CO<sub>2</sub> removal solutions and carbon capture, utilization, and storage technologies in California, as specified. The bill also requires CARB to submit an annual progress report.

### **2.5.2.6 Senate Bill 350**

California's Renewable Portfolio Standard was established in 2002 under SB 1078 and accelerated in 2006 under SB 107 by requiring that 20 percent of electricity retail sales be served by renewable energy sources by 2010. Subsequent recommendations in California energy policy reports advocated a goal of 33 percent by 2020, and on November 17, 2008, Governor Arnold Schwarzenegger signed EO S-14-08, requiring retail sellers of electricity to serve 33 percent of their load with renewable energy by 2020. In April 2011, SB X1-2 codified EO S-14-08, setting the new Renewable Portfolio Standard targets at 20 percent by the end of 2013, 25 percent by the end of 2016, and 33 percent by the end of 2020 for electricity retailers. Governor Edmund G. Brown Jr. signed SB 350 in October 2015, which extended the Renewable Portfolio Standard target by requiring retail sellers to procure 50 percent of their electricity from renewable energy resources by 2030.

### **2.5.2.7 Assembly Bill 1493 and Executive Order S-1-07**

In a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions, CARB adopted several emissions standards to reduce vehicle GHG emissions. AB 1493 was enacted in July 2002. AB 1493 requires CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. The 2009–2012 standards resulted in a reduction in approximately 22 percent of GHG emissions compared to emissions from the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30 percent for vehicles sold in model year 2016 and beyond. Standards that regulate vehicle model years 2009–2016 are termed "Pavley I." CARB adopted a second phase of the Pavley regulations, termed "Pavley II," which are now called the Low Emission Vehicle III (LEV III) standards. LEV III covers model years 2017–2025.

Issued on January 18, 2007, EO S-1-07 set a declining Low Carbon Fuel Standard (LCFS) for GHG emissions measured in CO<sub>2</sub>e grams per unit of fuel energy sold in California. The target of the LCFS was to reduce the carbon intensity of California passenger vehicle fuels by at least 10 percent by 2020. The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including

extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered. A 10 percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 16.5 MMT CO<sub>2</sub>e in 2020. However, to account for possible overlap of benefits between LCFS and the LEV III standards, CARB discounted the contribution of LCFS to 15 MMT CO<sub>2</sub>e.

In January 2012, CARB approved the Advanced Clean Cars Program, an emissions-control program for model years 2015–2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package (CARB 2024). To improve air quality, CARB implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. To reduce GHG emissions, CARB, in conjunction with the USEPA and the National Highway Traffic Safety Administration, adopted new GHG standards (LEV III standards) for model year 2017–2025 vehicles; the new standards are estimated to reduce GHG emissions by 34 percent in 2025.

### **2.5.2.8 California Code of Regulations, Title 24, Part 6**

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California’s building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established the Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. The California Energy Code is required by law to adopt standards every 3 years that are cost effective for homeowners over the 30-year lifespan of a building. These standards are updated to consider and incorporate new energy-efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The latest update to the Title 24 standards was approved in 2021 and went into effect on January 1, 2023 (the 2022 standards). The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards.

### **2.5.2.9 California Green Building Standards Code**

The California Green Building Standards Code (24 CCR Part 11) contains mandatory requirements for new residential and non-residential buildings throughout California. The code is Part 11 of the California Building Standards Code in Title 24 of the California Code of Regulations. The current 2022 standards for new construction of and additions and alterations to residential and non-residential buildings went into effect on January 1, 2023.

The California Green Building Standards Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the governor’s directives. The

code was established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction.

The California Green Building Standards Code contains requirements for stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resources conservation, and site irrigation conservation. The code provides for design options that allow the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, function at maximum efficiency.

#### **2.5.2.10 Executive Order N-79-20**

Governor Gavin Newsom signed EO N-79-20 in September 2020 to end sales of internal combustion passenger vehicles by 2035, which established a target for the transportation sector to put the state on a path to carbon neutrality by 2045.

#### **2.5.2.11 Senate Bill 375**

SB 375 addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans and was enacted into law in September 2008. SB 375 required CARB to adopt regional GHG emissions reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional Metropolitan Planning Organizations (MPOs) are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan. The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG emissions reduction targets. If an SCS is unable to achieve the GHG emissions reduction target, the MPO must prepare an Alternative Planning Strategy demonstrating how the GHG emissions reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

In 2010, CARB adopted the SB 375 targets for the regional MPOs. The targets for the San Diego Association of Governments (SANDAG) are a 15 percent reduction in emissions per capita by 2020 and a 19 percent reduction by 2035. SANDAG completed and adopted its most recent Regional Plan, San Diego Forward: The Regional Plan (2021 Regional Plan), in December 2021. The 2021 Regional Plan includes the region's SCS in accordance with SB 375 and continues to emphasize alternative transportation infrastructure and infill development (SANDAG 2021).

### **2.5.3 Regional**

The following describes the regional regulations relevant to the Project's GHG analysis.

### **2.5.3.1 2021 San Diego Forward: The Regional Plan**

SANDAG is the federally designated MPO for the San Diego region. SANDAG serves as a forum for public decision-making on regional issues such as growth, transportation, and land use in San Diego County and consists of representatives from each of San Diego County's local jurisdictions. The 2021 Regional Plan was adopted by the SANDAG Board of Directors on December 10, 2021. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies. The plan plays a key role in reducing GHG emissions from mobile sources in the region. Strategies related to GHG emissions reduction include providing regional alternatives to automobile transportation, and encouraging future development in identified Mobility Hubs with high concentrations of people, destinations, and travel choices. These strategies are intended to lower GHG emissions by reducing both the number of personal vehicle trips and trip distances (SANDAG 2021).

### **2.5.4 Local**

The following describes the local regulations relevant to the Project's GHG analysis.

#### **2.5.4.1 2008 City of San Diego General Plan**

The Conservation Element of the 2008 City of San Diego General Plan, as amended (2008 General Plan), contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, help define the City's identity, and are relied upon for continued economic prosperity. The purpose of this element is to help the City become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life (City of San Diego 2008).

The Land Use and Community Planning Element; the Mobility Element; the Urban Design Element; and the Public Facilities, Services, and Safety Element also identify GHG emissions reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation (City of San Diego 2008). The following policies are relevant to determining project consistency with climate change adaptation goals (City of San Diego 2022c):

- **LU-A.7:** Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the Project level when adequate direction is not provided in the community plan.
  - a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H).
  - b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community.
  - c. Evaluate the quality of existing and planned transit service.
- **ME-B.9:** Make transit planning an integral component of long range planning documents and the development review process.
  - a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process.
  - b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C.
  - c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process.
  - d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access.
  - e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment.
  - f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.
- **CE-J.2:** Include community street tree master plans in community plans.
  - a. Prioritize community streets for street tree programs.
  - b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form.
  - c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.
- **CE-J.3:** Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.



The 2008 General Plan introduced the City of Villages strategy, which proposes growth to be directed into pedestrian-friendly, mixed-use activity centers linked to an improved regional transit system. The City of Villages strategy shifts the focus of land use policies to encourage infill development and reinvest in existing communities. Locating different land use types near one another can decrease mobile emissions. Thus, the development of dense urban “villages” would generate fewer GHG emissions. The City of Villages strategy can be seen as an effort to avoid what is commonly referred to as “urban sprawl” (City of San Diego 2008).

Recent amendments to the 2008 General Plan include a refresh of the 2008 General Plan (Blueprint SD) in July 2024. The most recent 2024 amendments to the 2008 General Plan were developed after the issuance of the Notice of Preparation for the Project (December 2023) and are noted for information only.

#### **2.5.4.2 2022 City of San Diego Climate Action Plan**

The City adopted an updated qualified CAP in August 2022 that builds upon the 2015 CAP and establishes a community-wide goal of net-zero emissions by 2035. The 2022 CAP was developed in response to state legislation and policies that are aimed at reducing California’s GHG emissions, described previously, including Executive Order B-55-18, which was codified by AB 1279, and calls for California to achieve carbon neutrality by 2045. The 2022 CAP sets the target emissions level for 2035 at net-zero emissions and sets a science-based, fair share target for 2030 based on net zero emissions in 2035. It is anticipated that the City would achieve a reduction of 8,774,000 MT CO<sub>2</sub>e by 2035 with implementation of the 2022 CAP. However, additional reductions would be required to achieve net-zero emissions. The 2022 CAP relies on significant City and regional actions, continued implementation of federal and state mandates, and local strategies with associated action steps for target attainment (City of San Diego 2022a).

The overall strategies to achieve the 2022 CAP target include decarbonization of the built environment, access to clean and renewable energy, reduction of vehicle miles traveled through land use and transportation options, CH<sub>4</sub> capture and waste diversion, resilient infrastructure, habitat restoration, and pursuit of emerging climate actions (City of San Diego 2022a).

#### **2.5.4.3 City of San Diego Municipal Code, Chapter 14, Article 3, Division 14**

The City has adopted CAP Consistency Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 14) to ensure that all new development is consistent with the 2022 CAP. The CAP Consistency Regulations apply to specified ministerial and discretionary projects to ensure that projects comply with the goals and objectives of the 2022 CAP and contain measures that are required to be implemented on a project-by-project basis to confirm that the specified emissions targets identified in the 2022 CAP are achieved. Future development under the proposed Specific Plan would be required to comply with the following requirements outlined in the regulations (City of San Diego 2024a):

## Section 143.1410 Mobility and Land Use Regulations

The following regulations support alternative mobility options, such as walking and biking, that reduce vehicle dependency and associated GHGs.

- (a) Pedestrian enhancements that reduce heat island effects shall be provided as follows:
  - (1) For a premises that contains a street yard or abuts a public right-of-way that contains a Furnishings Zone, at least 50 percent of the Throughway Zone shall be shaded as specified below.
    - (A) If the adjacent public right-of-way contains a Furnishings Zone, the shading shall be provided by street trees.
    - (B) If the adjacent public right-of-way does not contain a Furnishings Zone, the shading may be provided by a combination of trees and shade structures placed in the street yard.
    - (C) The shade coverage of a tree shall be determined by the expected canopy at 10-year maturity. The tree shall be selected in accordance with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide.
    - (D) Trees shall be irrigated and maintained consistent with Section 142.0403.
    - (E) The number of street trees provided shall not be less than what is required by the Landscape Regulations in Chapter 14, Article 2, Division 4.
  - (2) For a premises that does not contain a street yard and does not abut a public right-of-way that contains a Furnishings Zone, the applicant shall do one of the following:
    - (A) Plant the number of trees required by Section 143.1410(a)(1) at an off-site location within 1 mile of the project premises and enter into an agreement with the owner of the off-site location that ensures the indefinite maintenance of the trees; or
    - (B) Pay an Urban Tree Canopy Fee to be deposited into the Climate Resiliency Fund, as adopted by City Council Resolution.
- (b) Development on a premises larger than one acre shall provide accessible pedestrian access and connectivity to directly adjacent premises as follows:
  - (1) Accessible pedestrian paths shall connect to existing paths or walkways on the adjacent premises, or to areas where such paths could be constructed.
  - (2) The accessible pedestrian paths shall be at least four feet wide, continuous, clear of obstructions, easily identifiable as a pedestrian path, and visually distinguishable from other hardscaping.
  - (3) The accessible pedestrian paths shall be separated from vehicular access areas by wheelstops, curbs, landscaping, or other physical barriers, except when crossing driveways or aisles.
  - (4) A development is exempt from the requirements of this section if either of the following apply:
    - (A) Both the premises on which the development is located and the adjacent premises are zoned for exclusively residential development; or

- (B) There is a grade differential of more than 3 feet between the premises on which the development is located and the adjacent premises that precludes an accessible pedestrian path.
- (c) At least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 shall be supplied with individual outlets for electric charging at each bicycle parking space.

### **Section 143.1415 Resilient Infrastructure and Healthy Ecosystems Regulations**

The following regulations support carbon sequestration as well as enhancement of air quality and the urban tree canopy.

- (a) Two trees shall be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises.
  - (1) If planting of a new tree is required to comply with this section, the tree shall be selected in accordance with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide.
  - (2) Where possible, trees should be planted in native soil. Where native soil planting is prohibited by site conditions, required trees may be provided in built-in or permanently affixed planters and pots on structural podiums. Planters and pots for trees shall have a minimum inside dimension of 48 inches.
  - (3) Trees shall be irrigated and maintained consistent with Section 142.0403.
  - (4) The number of trees provided shall not be less than what is required by the Landscape Regulations in Chapter 14, Article 2, Division 4.

#### **2.5.4.4 2021 City of San Diego Climate Resilient SD Plan**

On December 14, 2021, the San Diego City Council adopted the City's first-ever Climate Adaptation and Resiliency Plan, the Climate Resilient SD Plan. The plan provides strategies to prepare, respond, and recover from potential climate change hazards, such as extreme heat, wildfires, sea-level rise, and flooding and drought, as well as how the proposed investments can improve local communities. The plan will increase the City's ability to adapt, recover, and thrive in a changing climate (City of San Diego 2021).

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## Section 3 Thresholds of Significance, Methods, and Assumptions

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### 3.1 Thresholds of Significance

Given the relatively small levels of emissions generated by a typical development in relationship to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant direct impacts with respect to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG impacts from new development could result in significant cumulative impacts with respect to climate change. Thus, the potential for a significant GHG emissions impact is limited to cumulative impacts.

According to Appendix G of the CEQA Guidelines, a project would have a significant GHG emissions impact if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Regarding the first threshold, the City has prepared a CAP that meets the standards outlined in CEQA Guidelines Section 15183.5, whereby a lead agency (e.g., the City) may analyze and mitigate the significant effects of GHG emissions at a programmatic level in a General Plan, a Long Range Development Plan, or a separate plan to reduce GHG emissions (City of San Diego 2022a). Per the requirements of Section 15183.5, the 2022 CAP quantifies existing GHG emissions and projected emissions for the years 2030 and 2035 resulting from activities within the City's jurisdiction, and identifies City target emissions levels, below which the Citywide GHG impacts would be less than significant based on state emissions reduction goals. The 2022 CAP was evaluated through the CEQA process and a Final EIR was certified (SCH No. 2015021053), including analysis of the GHG emissions that would result from the business as usual scenario for the years 2030 and 2035. The 2022 CAP Update was evaluated in the Second Addendum to the Final EIR (City of San Diego 2022b). The 2022 CAP includes a monitoring and reporting program to ensure its progress toward achieving the specified GHG emissions reductions and specifies actions that, if implemented, would achieve the specified GHG emissions reductions targets. The City's Significance Thresholds and the Climate Action Plan Consistency Regulations (CAP Consistency Regulations) outline a process to determine whether individual projects would be consistent with 2022 CAP implementation targets (City of San Diego 2022d).

GHG emissions are a cumulative issue caused by global GHG emissions and not an individual project. Cumulatively, there exists a significant impact related to GHG emissions at the global level. As such, the impacts of individual projects are evaluated at the cumulative level only. The following

analysis evaluates whether the Project would result in cumulatively significant GHG emissions. The 2022 CAP outlines strategies to achieve GHG emissions reductions in line with statewide emissions reduction targets. As such, a project that demonstrates consistency with the 2022 CAP would not generate GHG emissions that would have a significant impact on the environment.

## **3.2 Methods and Assumptions**

The Project is evaluated for consistency with the 2022 CAP based on the methodology outlined in the City's CEQA Significance Determination Thresholds (2016, 2022e) and CAP Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects (City of San Diego 2022d). Project consistency with the 2022 CAP is determined through two steps. As outlined in the City's CEQA thresholds, the first step is to assess the Project's consistency with the growth projections used in the development of the 2022 CAP. The second step is to determine whether new development is consistent with the 2022 CAP's assumptions for relevant CAP strategies toward achieving the identified GHG emissions reduction targets. In accordance with the guidance in the CAP Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects (City of San Diego 2022d), the environmental analysis for plan -level environmental documents should address the ways in which the plan or policy is consistent with the goals and policies of the 2008 General Plan and 2022 CAP, specifically Policies LU-A.7, ME-B.9, CEJ.2, and CE-J.3 from the 2008 General Plan and all six strategies from the 2022 CAP: (1) Decarbonization of the Built Environment, (2) Access to Clean and Renewable Energy, (3) Mobility and Land Use, (4) Circular Economy and Clean Communities, (5) Resilient Infrastructure and Healthy Ecosystems, and (6) Emerging Climate Actions.

## Section 4 Project Impacts

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This section evaluates potential impacts of the Project related to GHG emissions.

### 4.1 Emissions of Greenhouse Gases

The Project is evaluated for Project-specific consistency with the 2022 CAP below, followed by a comparison of Project impacts to the significance determination of the Midway-Pacific Highway CPU PEIR for this issue.

#### 4.1.1 Project Climate Action Plan Consistency

Impacts related to GHG emissions associated with the Project are analyzed herein pursuant to the City's 2022 CAP, 2008 General Plan, and CAP Consistency Regulations.

During construction, the Project would result in temporary GHG emissions from the operation of heavy construction equipment, worker vehicle trips, and truck trips bringing materials to and from the site. During operation, buildout of the Project would result in direct and indirect emissions from energy consumption, water and wastewater transport, and solid waste generation. GHG emissions from electricity consumed on site by the Project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water and wastewater transport would be indirect emissions resulting from the energy required to transport water from its source and the energy required to treat wastewater and transport it to its treated discharge point. Development would also generate mobile source emissions from motor vehicle trips. The site is an existing source of emissions related to vehicle trips, energy use, water use, and solid waste generation from existing development on the site.

Determining project consistency with the 2022 CAP is a two-step process. Step 1 in determining 2022 CAP consistency for development projects is to assess a project's consistency with the growth projections used in the development of the 2022 CAP. Step 2 is to determine whether a project is consistent with relevant 2022 CAP strategies to achieve identified GHG emissions reduction targets, including the CAP Consistency Regulations. Consistency with Step 1 must be achieved before proceeding to Step 2. These steps are evaluated below for the Project.

#### 2022 CAP Consistency Step 1: Growth Projections

The first step in this analysis is to assess whether the Project would be consistent with the 2022 CAP land use and growth assumptions. For projects consistent with the 2022 CAP assumptions, GHG emissions associated with the construction and operation of the Project are assumed to be included in the 2022 CAP GHG emissions inventory and business-as-usual GHG emissions projections prepared for the 2022 CAP. Temporary Project construction emissions and long-term operation of land use development were included in the 2022 CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the 2022 CAP (City of San Diego 2022d). There are three ways a project can demonstrate land use and growth assumption consistency:

- i. Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations; or
- ii. If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA); or
- iii. If the proposed project is not consistent with the existing land use plan and zoning designations, does the project include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?

A project only needs to meet one of the above options to demonstrate land use and growth assumption consistency. The applicable land use plans and growth assumptions for the Project site are in the 2008 General Plan and the 2018 Community Plan, which implements 2008 General Plan policies at the community plan level. Regarding Option (i), the Project would provide a mix of residential, commercial, and entertainment uses and parks and public spaces consistent with the land use types identified in the 2018 Community Plan. However, the Project would accommodate additional residential development beyond the assumptions of the 2018 Community Plan for the Specific Plan Area. Therefore, Option (i) is not applicable.

Regarding Option (ii), the additional residential development proposed under the Project would result in increased density in a TPA, which is consistent with 2022 CAP development goals. As shown on the City's Transit Priority Area maps, the Project site is located within the boundaries of an existing TPA, as identified in the 2018 Community Plan and online City TPA map (City of San Diego 2024b). The Project site is within the boundaries of the Parking Standards Transit Priority Area Overlay Zone and Transit Priority Area Overlay Zone and partially within the Transit Area Overlay Zone. Increasing development density in a TPA specifically supports Strategy 3 of the 2022 CAP, Mobility and Land Use. This strategy includes an action to focus new development in TPAs. As outlined in this action, TPAs are areas that reduce GHG emissions by facilitating residents, employees, and visitors to safely, conveniently, and enjoyably travel as a pedestrian or by biking or transit. The 2022 CAP does not include additional specifications or requirements for this criterion. Therefore, the Project meets the Option (ii) requirement to demonstrate consistency with the 2022 CAP. Because the Project demonstrates consistency with the 2022 CAP assumptions under Option (ii), demonstration of Project consistency with Option (iii) is not required.

The Project would increase residential density in a TPA and, therefore, achieve Step 1 in determining 2022 CAP consistency.

## **2022 CAP Consistency Step 2: CAP Strategies**

Step 2 is to determine whether the Project is consistent with relevant 2022 CAP strategies to achieve identified GHG emissions reduction targets. The City has outlined different requirements applicable to



plan-level projects and individual development projects. The Project proposes a new Specific Plan. The guidelines outlined in the CAP Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects apply to the Project (City of San Diego 2022d, 2022e). The Project must also be evaluated against the CAP Consistency Regulations required for individual development projects because the Project includes specific development at the Vesting Tentative Map level. The requisite analyses are included in Table 2, General Plan and Climate Action Plan Consistency.

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
<b>2008 General Plan<sup>1</sup></b>	
<p>LU-A.7: Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the Project level when adequate direction is not provided in the community plan.</p> <p>(a) Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H).</p> <p>(b) Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community.</p> <p>(c) Evaluate the quality of existing and planned transit service.</p>	<p>The Project is not a new community plan. It is located within the boundaries of the 2018 Community Plan, which provides adequate direction for land use mix at the community plan level. As such, the Project is evaluated for consistency with the 2018 Community Plan as it relates to this policy.</p> <p>In accordance with the 2018 Community Plan vision and Policy LU-A.7 related to land use mix, the Project proposes a mix of residential, commercial, retail, entertainment, public spaces, and park uses within a TPA that furthers the City of Villages strategy. The proposed Specific Plan would implement design requirements for cohesive, connected development that establishes a distinctive district within the 2018 Community Plan area. The Project site is designated for Community Commercial use in the 2018 Community Plan, including residential development. This designation allows a variety of commercial uses that serve residents and workers in the community and adjacent communities. Residential uses are allowed as part of mixed-use development that features ground floor commercial uses. The Project would increase density on the site compared the 2018 Community Plan; however, development is consistent with types of land uses allowed and the vision for the area as a distinct activity center. A variety of multimodal improvements have been incorporated into the Project site and to the surrounding community (Policy a). As identified in Specific Plan Section 5.2, Mobility Objectives, the Project would provide the following regional-serving mobility improvements:</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
	<ul style="list-style-type: none"> <li>• Provide Class I multi-use path along the Project frontage (south side) on Kurtz Street</li> <li>• Provide Class I multi-use path along the south side of Kurtz Street (east of the Project site) and along the southeast side of Rosecrans Street to provide a connection to the Old Town Transit Center via walking and biking.</li> <li>• Provide Class I multi-use path (Bay-to-Bay Urban Path) along the eastern side of proposed Frontier Drive</li> <li>• Provide Class I multi-use path (Bay-to-Bay Urban Path) along the Project frontage (north side) on Sports Arena Boulevard and a Class IV one-way cycle-track in the westbound direction along the Project frontage</li> <li>• Provide Class IV one-way cycle-tracks on both sides of the proposed Kemper Street extension within the Project site</li> <li>• Construction of a roundabout at the intersection of Hancock Street and Kurtz Street.</li> <li>• Stripe exclusive bus/right-turn only lanes on Sports Arena Boulevard and Rosecrans Street</li> <li>• Provide enhancements to the two existing local bus stops along the Project frontage on Sports Arena Boulevard and construct a new Bus Rapid Transit bus stop per the MTS Designing for Transit Manual (2018)</li> </ul> <p>The Project applicant shall coordinate with the MTS, SANDAG, and City regarding the timeline and design details of implementation for these improvements and future Bus Rapid Transit service. A timeline has not been established for future Bus Rapid Transit. However, Bus Rapid Transit service to the area is identified as part of the near term (by 2035) transportation network in the 2021 Regional Plan and Draft Proposed 2025 Regional Plan Transportation Network (SANDAG 2021, 2024).</p> <p>As described in Step 1 of the 2022 CAP Consistency analysis, the Project site is located in an identified TPA. It would provide transit-</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
	<p>supportive density and design by providing mixed-use development along with multimodal circulation system improvements on the Project site (Policy b), as listed above. Consistency with Policy C, the Local Mobility Analysis prepared for the Project evaluates area transit service, including the information summarized above for Policy a. Therefore, the Project would be consistent with this 2008 General Plan policy.</p>
<p>ME-B.9: Make transit planning an integral component of long range planning documents and the development review process.</p> <ol style="list-style-type: none"> <li>a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process.</li> <li>b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C.</li> <li>c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process.</li> <li>d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access.</li> <li>e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment.</li> <li>f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.</li> </ol>	<p>The Project site is on an existing bus route, and the Project would construct a bus stop for a future Bus Rapid Transit route in the center of the Project's Sports Arena Boulevard street frontage (at proposed Frontier Drive) to create a strong transit connection (Policy a). Multimodal circulation improvements included in the Project are listed above in Policy LU-A.7</p> <p>The Project would provide new, higher density residential and commercial development in an identified TPA, consistent with (Policy b). The site is currently served by bus service, and is located on a planned higher-quality Bus Rapid Transit route, as described above in Policy LU-A.7.</p> <p>The Project would include public right-of-way (ROW) improvements for multimodal travel and transit service, as listed above under Policy LU-A.7 (Policy c). These ROW improvements include the Sports Arena Boulevard street frontage, an existing transit route. As such, through the site planning process, the Project would dedicate ROW along an existing transit route, including bus stop improvements.</p> <p>The Project would include new public facilities, including parks and public spaces and entertainment uses in an area with existing and planned transit access (Policy d). The public facilities would include widened, enhanced, and activated sidewalks, a central green, and an urban square that are intended to serve as a focal point for the community. The enhanced public areas would encourage use of the site as a recreational area, and</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
	<p>entertainment and community events would generate visitors to the site. As described above, the Project is located in an existing TPA and currently served by bus transit service.</p> <p>As previously described under Policy LU-A.7, the Project would enhance area walkability through new multimodal facilities on Project frontages and internal streets (Policy e) and through the provision of parks, paseo greens, and paseo greenways. Development on the site would be walkable and connected to new pedestrian walkways. Walkways would include street trees and lighting, and pedestrian wayfinding signage would be available throughout the site.</p> <p>The Project site does not include a rail corridor, and Requirement f is not applicable to the Project. Therefore, the Project would be consistent with this 2008 General Plan policy.</p>
<p>CE-J.2: Include community street tree master plans in community plans.</p> <ul style="list-style-type: none"> <li>a. Prioritize community streets for street tree programs.</li> <li>b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form.</li> <li>c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.</li> </ul>	<p>The Specific Plan is consistent with the 2018 Community Plan policies regarding street trees. The 2018 Community Plan identifies the perimeter of the Project site and planned Kemper Street and Frontier Drive segments as Green Streets, including a linear park on Sports Arena Boulevard. The Specific Plan identifies tree planting zones and an accompanying tree palette. Sports Arena Boulevard, Kurtz Street, Frontier Drive, and Kemper Street are community streets that have been identified for street trees (Policy a). The Sports Arena Boulevard frontage is proposed to be a linear park promenade with a wide multimodal path, and amenities such as seating and play features. Additionally, all site development would be connected by walkways lined with street trees, including the identified Green Streets.</p> <p>Each of these streets has an accompanying palette of recommended tree species (Policy b). Native and adaptive trees with the following characteristics were selected for the palette: abundant shade canopy, drought- tolerance, low maintenance, seasonal interest (see Specific Plan Appendix D, Plant Palette).</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
	There are no known protected trees in the Midway-Pacific Highway Community planning area (Policy c). Therefore, the Project would be consistent with this 2008 General Plan policy.
CE-J.3: Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.	The Project is not a community plan; therefore, this policy does not specifically apply to the Project. However, the Specific Plan is located within the 2018 Community Plan area and is consistent with the 2018 Community Plan policies regarding street trees. The Specific Plan identifies tree planting zones and an accompanying tree palette consistent with the Green Streets identified in the 2018 Community Plan. Thus, the Specific Plan supports the Community Plan and General Plan in furthering the Citywide vision for a comprehensive Urban Forest Master Plan. Therefore, the Project would be consistent with this 2008 General Plan policy.
2022 Climate Action Plan	
<p>Strategy 1: Decarbonization of the Built Environment.</p> <p>For Strategy 1, the project should:</p> <ul style="list-style-type: none"> <li>• Demonstrate that it would not conflict with the achievement of the decarbonization of the built environment.</li> <li>• Discuss any projects/project features that would reduce or eliminate the use of fossil fuels.</li> </ul>	<p>As detailed in the Specific Plan Appendix A, Climate Action Plan Consistency, buildings would be all-electric except for emergency generators and commercial kitchen equipment at eating and drinking establishments. This approach is consistent with the Draft San Diego All-Electric Reach Code (City of San Diego 2023), which has been proposed to implement this 2022 CAP strategy.</p> <p>Specific Plan Appendix A, Climate Action Plan Consistency, also includes photovoltaic cells on all buildings with the exception of the entertainment center, renewable energy service from San Diego Community Power, and LED lighting for traffic lights included in Project roadway improvements, which would reduce the Project's use of fossil fuels. As described in the parking assumptions in Section 3.6, Assumptions for SEIR Analysis, of the SEIR prepared for the Project, the Project would include 353 EV charging stations, 1,700 EV capable spaces, and 1,138 EV-ready spaces. As such, the Project would be consistent with this 2022 CAP strategy.</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
<p>Strategy 2: Access to Clean &amp; Renewable Energy.</p> <p>For Strategy 2, the project should explain how the project would not conflict with the achievement of a goal of 100% renewable energy.</p>	<p>As detailed in Specific Plan Appendix A, Climate Action Plan Consistency, Project energy demand would be met through on-site renewable energy generation (solar) and provision of renewable energy through participation in San Diego Community Power. San Diego Community Power is a Community Choice Aggregate program that serves the Project site. San Diego Community Power partners with San Diego Gas &amp; Electric to deliver purchased electricity from renewable energy sources. As such, the Project would be consistent with this 2022 CAP strategy.</p>
<p>Strategy 3: Mobility &amp; Land Use.</p> <p>For Strategy 3, the project should:</p> <ul style="list-style-type: none"> <li>• Explain how the project would not conflict with the achievement of the Strategy 3 goals, and explain any project features that would further the goals of Strategy 3, such as providing or facilitating the delivery of: <ul style="list-style-type: none"> <li>○ Bicycle improvements, including, but not limited to <ul style="list-style-type: none"> <li>▪ Green bike lane</li> <li>▪ Sharrow</li> <li>▪ Buffered bike lane</li> </ul> </li> <li>○ Pedestrian ramps or other pedestrian crossing improvements</li> <li>○ Transit improvements</li> </ul> </li> <li>• Note where any public infrastructure project would support new development that achieves the City’s climate goals, specifically to provide housing and development located within Transit Priority Areas.</li> </ul>	<p>As described above regarding 2008 General Plan Policy LU-A.7 consistency, the Project would further the goals of Strategy 3 by improving bicycle, pedestrian, and transit connections on site and to the surrounding community. The Project would include new Class I and Class IV bicycle facilities, both of which are defined as non-motorized lanes physically separated from vehicle traffic. Class I facilities would also provide protected pedestrian facilities. The Project would provide enhanced pedestrian connections through the Project site and to regional facilities, including to the Old Town Transit Center. Two existing bus stops would be improved, and one new bus stop would be constructed to accommodate planned Bus Rapid Transit service in the future. Additionally, the Project would provide new mixed-use development with affordable housing and community-serving retail within a TPA. The Project would be consistent with this 2022 CAP strategy.</p>
<p>Strategy 4: Circular Economy &amp; Clean Communities.</p> <p>For Strategy 4, the Project should:</p> <ul style="list-style-type: none"> <li>• Briefly describe how it would comply with the City’s Construction and Demolition Debris Diversion Ordinance.</li> </ul>	<p>Construction of the Project would comply with the City’s Construction and Demolition Debris Diversion Ordinance, as applicable. For example, with the exception of soil potentially containing hazardous materials, excavated soil from earlier phases of development would be stored to be used as fill for later phases. Balancing earthwork quantities to the extent</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
<ul style="list-style-type: none"> <li>• Note where project operations would generally not increase solid waste production.</li> </ul>	<p>feasible would reduce truck trips and required disposal. The Project site is currently a source of solid waste from the existing San Diego International Sports Arena and commercial uses. The Specific Plan includes a requirement that implementing development shall provide a comprehensive waste diversion plan showing how a building or set of buildings would reduce single-use plastic/Styrofoam and increase recycling and compost collection (Specific Plan Appendix A, Climate Action Plan Consistency). As such, new development would be expected to be more waste-efficient compared to existing uses. The Project would be consistent with this 2022 CAP strategy.</p>
<p>Strategy 5: Resilient Infrastructure and Healthy Ecosystems.</p> <p>For Strategy 5, the project should:</p> <ul style="list-style-type: none"> <li>• Describe any project features that further the City’s climate resiliency goals, such as: <ul style="list-style-type: none"> <li>○ Replacement of any street trees that need to be removed</li> <li>○ Addition of street trees to the public right-of-way</li> <li>○ The offering of street trees to adjacent property owners</li> </ul> </li> <li>• Explain how the project furthers climate resiliency, e.g., storm drain maintenance to prepare for greater prevalence of extreme rain events.</li> </ul>	<p>As described in greater detail below regarding consistency with CAP Regulation 143.1410(a), Project implementation would include a comprehensive street tree and landscape plan consistent with the open space and urban canopy goals of the 2022 CAP, as well as 2018 Community Plan requirements Removal of street trees would be replaced at a minimum of 1:1, with new trees that would provide shade and aesthetic value to the community. New trees that would meet SDMC tree canopy requirements would be added to the ROW and throughout the Project site to reduce urban heat island effect. Additionally, the Project would reduce impervious surfaces on the site by approximately 7% compared to existing conditions and install best management practices to improve stormwater quality (City of San Diego 2024c). As discussed in Section 5.7, Hydrology/Water Quality, in the SEIR prepared for the Project, implementation of the Project would create approximately 14.54 acres of pervious landscape area and improved stormwater facilities, including sustainable stormwater features that would be incorporated into Project green spaces. As detailed in the Specific Plan, to reduce the potential for flooding on and off site, the proposed building finish floor elevations for</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
	the Project would be a minimum 1 foot higher than the adjacent existing finish floor elevations (Specific Plan Chapter 7, Infrastructure and Services). The Project would be consistent with this 2022 CAP strategy.
<p>Strategy 6: Emerging Climate Action.</p> <p>For Strategy 6, the Project should explain how it does not conflict with the achievement of this strategy, and discuss any emerging climate actions included in project implementation.</p>	<p>Specific implementation actions under Strategy 6 are currently unknown, and evaluation of consistency with potential actions would be speculative. The Project does not include any components that would conflict with research or implementation of emerging climate technologies or strategies developed through new City partnerships. As new technologies become available, they may be incorporated into future building design. The Project supports Strategy 6 goals related to carbon sequestration and reducing air quality pollutants of concern by providing new tree cover and providing new pedestrian, bicycle, and transit connections to reduce vehicle trips, as described above. Therefore, the Project would be consistent with this 2022 CAP strategy.</p>

**Climate Action Plan Consistency Regulations**

<p>SDMC Section 143.1410(a): Pedestrian enhancements that reduce heat island effects shall be provided as follows:</p> <ul style="list-style-type: none"> <li>i. Development on a premises that contains a street yard or abuts a public right-of-way that contains a Furnishings Zone, at least 50 percent of the Throughway Zone shall be shaded as specified below.<sup>1</sup> <ul style="list-style-type: none"> <li>(A) If the adjacent public right-of-way contains a Furnishings Zone, the shading shall be provided by street trees.</li> <li>(B) If the adjacent public right-of-way does not contain a Furnishings Zone, the shading may be provided by a</li> </ul> </li> </ul>	<p>The Project site abuts a public ROW with a Furnishings Zone on Sports Arena Boulevard. As such, Section 143.1410(a)(1) contains the regulations applicable to the Project. Because Section 143.1410(a)(1) applies, Section 143.1410(a)(2) is not applicable and is not addressed below.</p> <p>As described in Chapter 3, Village Concept, of the Specific Plan, the proposed landscape plan for the Project identifies a continuous tree canopy to provide shading on all adjacent Project streets. As such, shading would be provided by street trees on ROWs that do and do not contain Furnishing Zones, in accordance with Requirements A and B. This would include new promenades with tree canopies on both</p>
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<sup>1</sup> As defined in SDMC Section 43.1405, a Furnishings Zone is the zone that provides the buffer between the active pedestrian area, the Throughway Zone, and street traffic and accommodates street trees, landscaping, street furniture, utility poles, parking meters, fire hydrants, bicycle racks, and similar improvements. A Throughway Zone is the zone that is intended for pedestrian travel only and should be entirely clear of obstacles.



**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
<p>combination of trees and shade structures placed in the street yard.</p> <p>(C) The shade coverage of a tree shall be determined by the expected canopy at 10-year maturity. The tree shall be selected in accordance with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide.</p> <p>(D) Trees shall be irrigated and maintained consistent with Section 142.0403.</p> <p>(E) The number of street trees provided shall not be less than what is required by the Landscape Regulations in Chapter 14, Article 2, Division 4.</p> <p>ii. Development on a premises that does not contain a street yard and does not abut a public right-of-way that contains a Furnishings Zone, the applicant shall do one of the following:</p> <p>(A) Plant the number of trees required by Section 143.1410(a)(1) at an off-site location within 1 mile of the Project premises and enter into an agreement with the owner of the off-site location that ensures the indefinite maintenance of the trees; or</p> <p>(B) Pay an Urban Tree Canopy Fee to be deposited into the Climate Resiliency Fund, as adopted by City Council Resolution</p>	<p>sides of the multi-use path on Sports Arena Boulevard, sections of Kurtz Street, and Kemper Street, and in the Furnishing Zone of the planned Frontier Drive. Architectural shade structures are also identified as an amenity to be provided throughout proposed public spaces.</p> <p>In accordance with Requirement C trees would be placed so that a minimum of 50% of pedestrian areas in the public ROW would be shaded by street trees at 10 years maturity. Tree placement, as shown on the conceptual public street designs (Specific Plan Figure 8, Figure 10, Figure 14, and Figure 16) and conceptual designs for park and public space areas (Specific Plan Figures 27 through 32) would ensure 50 percent coverage at year 10.</p> <p>The Project landscape plan, subject to City approval, would comply with all City standards and regulations, including the City's Land Development Manual, Street Tree Selection Guide, and Landscape Regulations. Trees would be irrigated with permanent, below-grade irrigation systems and would comply with all planting and irrigation requirements in SDMC Section 142.0403 (Requirement D). The Vesting Tentative Map for the Project identifies tree coverage that would exceed the currently calculated 858 tree requirement per the City's Landscape Regulations (PDC 2024) (Requirement E). Currently, the landscape plan for the site identifies 1,075 trees on the Project site and an additional 355 trees in roadway ROW. The plan is subject to change; however, the Project would comply with applicable City requirements, including tree requirements. Therefore, the Project would meet the street tree requirements identified in the City's Landscape Regulations.</p> <p>In addition to the specific requirements above, the Project would include pedestrian enhancements that reduce heat island effects throughout the site. As described in Specific Plan Section 5.4, Pedestrian Circulation and Promenades, all uses, buildings, parks and public spaces, and amenities on the Project site would be accessible and continuously connected by a network of paths, promenades, paseos, and greenways. The heat</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
	<p>island effect would be reduced on this network through a continuous tree canopy. As described in Specific Plan Section 6.4, Public Space and Park Design, shade trees are also proposed in the neighborhood park, in paseo greens and paseo greenways and public plazas, and along private drives. As such, the Project would be consistent with this CAP Consistency Regulation.</p>
<p>143.1410(b): Development on a premises with 250 linear feet or more of street frontage shall provide and privately maintain at least one of the following publicly accessible pedestrian amenities for every 250 linear feet of street frontage to the satisfaction of the Development Services Department:</p> <ol style="list-style-type: none"> <li>(1) One trash receptacle and one recycling container.</li> <li>(2) Seating comprised of movable seats, fixed individual seats, benches with or without backs, or design feature seating, such as seat walls, ledges, or seating steps;</li> <li>(3) Pedestrian-scale lighting that illuminates the adjacent sidewalk;</li> <li>(4) Public artwork;</li> <li>(5) Community wayfinding signs; or</li> <li>(6) Enhancement of a bus stop or public transit waiting station within 1,000 feet of the premises.</li> </ol>	<p>The Project would include pedestrian facilities along all Project street frontages, including sidewalks or multi-use paths, as part of promenades along Sports Arena Boulevard, parts of Kurtz Street, Kemper Street, and proposed Frontier Drive. Although the precise location of amenities has not been determined, these facilities would include trash receptables (Requirement 1), seating (Requirement 2), lighting (Requirement 3), public artwork (Requirement 4), and community wayfinding signs (Requirement 5), as detailed for promenades in Specific Plan Section 6.4, Public Space and Park Design. At least one amenity would be available per 250 linear feet of street frontage, as required.</p> <p>Enhancements would be provided to two existing bus stops (at the intersection with proposed Frontier Drive, and adjacent to the proposed entertainment center) and one proposed bus stop on Sports Arena Boulevard (at the intersection with Kemper Street) in accordance with Requirement 6. The existing bus stops currently have only benches. The Project would enhance the two existing bus stops to provide amenities including a new bench, transit shelter, schedule display, route and system map, trash receptable, and bus pad. The new bus stop would be designed with Bus Rapid Transit amenities, per the MTS Designing for Transit Manual, and include the amenities above in addition to a real-time route digital display. As such, the Project would be consistent with this CAP Consistency Regulation.</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
<p>143.1410(c): At least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 shall be supplied with individual outlets for electric charging at each bicycle parking space.</p>	<p>Bicycle parking would be provided at residential and non-residential uses on the Project site as required by SDMC Chapter 14, Article 2, Division 5. Short-term and long-term bicycle parking would be provided to serve proposed residential, retail, and event uses, including parks and public space areas and promenades for public use. In accordance with this regulation, outlets for charging e-bikes would be provided to 50% of stalls as detailed in the Specific Plan. As such, the Project would be consistent with this CAP Consistency Regulation.</p>
<p>143.1415(a): The following regulations support carbon sequestration as well as enhancement of air quality and the urban tree canopy.</p> <p>(a) Two trees shall be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises.</p> <p>(1) If planting of a new tree is required to comply with this section, the tree shall be selected in accordance with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide.</p> <p>(2) Where possible, trees should be planted in native soil. Where native soil planting is prohibited by site conditions, required trees may be provided in built-in or permanently affixed planters and pots on structural podiums. Planters and pots for trees shall have a minimum inside dimension of 48 inches.</p> <p>(3) For a premises located within a base zone that does not require open space to accommodate the planting of on-site trees in compliance with this Section, the applicant shall do one of the following, except that all trees required by the Landscape Regulations in Chapter 14, Article 2, Division 4 must be provided on-site:</p> <p>(A) Plant the number of trees required by Section 143.1415(a) at an off-site</p>	<p>The Project would provide trees at a minimum of two per 5,000 square feet of lot area, with a minimum of one tree per lot. A variety of shade trees listed in the 2018 Community Plan, and Street Tree Selection Guide would be used in accordance with Requirement 1 (PDC 2024).</p> <p>Trees would be planted in native, amended soil in all areas not prohibited by site conditions (Requirement 2).</p> <p>The Project is required to include open space areas; therefore, Requirement 3 does not apply to the Project.</p> <p>Trees would be irrigated with permanent, below-grade irrigation systems and would comply with all Planting and Irrigation Requirements in SDMC Section 142.0403 (Requirement 4).</p> <p>As described above under SDMC Section 143.1410(a), the Project would meet the landscape requirements identified in the City's Landscape Regulations, including number of street trees and shading requirements (Requirement 5).</p> <p>Refer to Project consistency with SDMC Section 143.1410(a) for additional detail regarding the proposed tree canopy. The Project would provide new trees consistent with regulatory requirements and 2022 CAP urban canopy goals. As such, the Project would be consistent with this CAP Consistency Regulation.</p>

**Table 2. General Plan and Climate Action Plan Consistency**

Policy or Strategy	Project Consistency
<p>location within one mile of the development and enter into an agreement with the owner of the off-site location that ensures the indefinite maintenance of the trees; or</p> <p>(B) Pay an Urban Tree Canopy Fee to be deposited into the Climate Resiliency Fund consistent with adopted City Council Resolution.</p> <p>(4) Trees shall be irrigated and maintained consistent with Section 142.0403.</p> <p>(5) The number of trees provided shall not be less than what is required by the Landscape Regulations in Chapter 14, Article 2, Division 4</p>	

**Sources:** City of San Diego 2022a, 2022c, 2022d.

**Notes:**

<sup>1</sup> The City's 2008 General Plan was updated in 2024. However, the amendment was adopted after the Project ' NOP was published and is noted for information only. Additionally, the 2008 General Plan was in place when the 2022 CAP was adopted. 2008 General Plan = 2008 City of San Diego General Plan; 2018 Community Plan = 2018 Midway-Pacific Highway Community Plan; CAP = Climate Action Plan; EV = electric vehicle; LED = light-emitting diode; MTS = San Diego Metropolitan Transit System; ROW = right-of-way; SANDAG = San Diego Association of Governments; SDMC = San Diego Municipal Code; SEIR = Subsequent Environmental Impact Report; TPA = Transit Priority Area

As demonstrated in Table 2, future Project design would comply with the sustainability regulations adopted to meet the 2008 General Plan, 2022 CAP, and CAP Consistency Regulations. In addition to the requirements described previously, additional California and City regulations limit construction equipment and vehicle idling, promote energy efficiency (California Code of Regulations Sections 2449.1–2449.3), and mandate solid waste diversion reduce solid waste reduction (SDMC Section 66.06). Moreover, increasingly stringent state and local regulations would reduce ongoing emissions, such as vehicle emissions standards and waste diversion programs. As demonstrated above, the Project would be consistent with 2022 CAP requirements for new development (Step 1 and Step 2). Therefore, GHG impacts from the Project would be **Less than Significant**.

## 4.2 Consistency with Local Plans Adopted for the Purpose of Reducing Greenhouse Gas Emissions

The plans, policies, and regulations adopted to reduce GHG emissions that are applicable to the Project include the City’s 2022 CAP, the City’s Climate Resilient SD Plan, SANDAG’s 2021 Regional Plan, and the long-term statewide emissions reduction goals outlined in CARB’s 2022 Scoping Plan.

### 4.2.1 2022 City of San Diego Climate Action Plan and Consistency Regulations

As detailed previously in Table 2, the Project would be consistent with the 2022 CAP and CAP Consistency Regulations.

### 4.2.2 2021 City of San Diego Climate Resilient SD Plan

The Climate Resilient SD Plan provides strategies to prepare, respond, and recover from potential climate change hazards, such as extreme heat, wildfires, sea-level rise, and flooding and drought, as well as how the proposed investments can improve local communities. The plan will increase the City’s ability to adapt, recover, and thrive in a changing climate. Key plan components include connected and informed communities, resilient and equitable planning and investment, protection for historical and Tribal Cultural Resources, protection for natural environments, and maintenance of critical infrastructure. Project features that support relevant Climate Resilient SD Plan policies are summarized in Table 3, Climate Resilient SD Plan Consistency.

**Table 3. Climate Resilient SD Plan Consistency**

Policies	Project Consistency
<p>Policy RE-2: Foster vibrant, healthy and sustainable communities.</p> <ul style="list-style-type: none"> <li>• Support expansion and management of an active transportation network. Provide safe, accessible active transportation infrastructure.</li> <li>• Explore opportunities and programs to increase access to healthy food markets, farmer’s markets and other local food networks, particularly for low-income residents and families.</li> <li>• Increase access to parks and open space for all San Diegans. Increase overall shaded area at park spaces. Natural shade from trees shall be prioritized over artificial shade structures, whenever feasible.</li> <li>• Incentivize installation of cool roofs and green roofs.</li> </ul>	<p>As described in Table 2, the Project would include a comprehensive active transportation network, including new multi-modal Class I multi-use paths that would be separated from vehicle traffic and provide safe and accessible multi-use facilities. Additionally, the Project would include new parks and public spaces, including space for community events like farmers markets. Healthy food markets already exist within walking distance of the Project site, including a supermarket and a large retail store with fresh groceries across from the site on Sports Arena Boulevard, a grocery store 0.25 mile southeast of the site on Rosecrans Street, and a supermarket 0.5 mile southwest of the site on Midway Drive. New parks and public space amenities would be regionally accessible through the proposed alternative</p>

**Table 3. Climate Resilient SD Plan Consistency**

Policies	Project Consistency
<ul style="list-style-type: none"> <li>Utilize the Urban Heat Vulnerability Index to help inform implementation of adaptation strategies to address extreme heat events and identify priority areas for cooling interventions.</li> </ul>	<p>transportation improvements, including a connection to Old Town Transit Center, bus stop improvements, and a new bus stop to accommodate future Bus Rapid Transit service. A net increase in trees on the Project site beyond City requirements, including a continuous tree canopy on street frontages, would reduce the urban heat island effect. The Project would not conflict with this Climate Resilient SD Plan policy.</p>
<p>Policy RE-3: Prioritize strategies with multiple benefits that increase the adaptive capacity of the City's most vulnerable communities.</p> <ul style="list-style-type: none"> <li>Collaborate with the Air Pollution Control District (APCD) to implement the Community Emissions Reduction Plan (CERP) and AB 617.</li> <li>Develop an urban greening program to promote expanded green spaces in urban areas. The program should facilitate greening of City buildings and encourage private development to include green features through policy development or incentive programs.</li> <li>Establish a community garden program to convert vacant lots, rooftops or other available space to public community gardens.</li> </ul>	<p>Project implementation would not interfere with City and APCD implementation of the CERP. The CERP, currently being prepared in accordance with AB 617, addressed air quality concerns in the International Border Community area in the southernmost portion of the City. The Project site is outside of this area and the CERP does not apply.</p> <p>Regarding the second and third bullets, the Project would include urban greening programs, including new parks and public spaces and a continuous tree canopy. New public gathering spaces would be available for farmers markets. New buildings and green spaces would not preclude the establishment of community garden programs in available spaces. The Project would not preclude the future development of City programs to encourage green features or community gardens. The Project would not conflict with this Climate Resilient SD Plan policy.</p>
<p>Policy RE-4: Deepen community partnerships to support greater community involvement in resilience action and plan implementation.</p> <ul style="list-style-type: none"> <li>Cultivate leadership and environmental stewardship in San Diego's youth. Consider partnerships with local schools and universities, and tribal organizations with active climate and resiliency programs, as well as focused internship programs and leadership opportunities.</li> </ul>	<p>The Project would not interfere with City youth programs or community engagement programs because the Project site does not currently include facilities for these programs. Therefore, no existing programs would be impacted. The Project would provide new public spaces that may facilitate community engagement in the Project area. The Project would promote water conservation through compliance with State Green Building Standards, City Water Use Restrictions, and City Landscape Standards. Trees would be irrigated with permanent, below-grade</p>

**Table 3. Climate Resilient SD Plan Consistency**

Policies	Project Consistency
<ul style="list-style-type: none"> <li>• Create principles for meaningful, equitable community engagement. Identify ways to remove barriers to participation.</li> <li>• Promote water conservation, water reuse and best management practices in local businesses and industry.</li> </ul>	<p>irrigation systems and comply with all City planting and irrigation requirements. The Project would not conflict with this Climate Resilient SD Plan policy.</p>
<p>Policy TNE-4: Prioritize installation of green infrastructure wherever feasible.</p> <ul style="list-style-type: none"> <li>• Improve stormwater infrastructure resilience.</li> <li>• Maximize planning and implementation of green infrastructure at watershed scale and site specific.</li> </ul>	<p>As discussed in Section 5.7, Hydrology/Water Quality, of the SEIR prepared for the Project, the Project would reduce impervious surfaces on the site by approximately 7%. The Stormwater Quality Management Plan (City of San Diego 2024c) prepared for the Project includes new green infrastructure, including new landscape and park and public space areas, modular wetlands, and biofiltration planters for treatment. The improvements would accelerate stormwater infrastructure resilience. The Project would not conflict with this Climate Resilient SD Plan policy.</p>
<p>Policy TNE-6: Protect and expand the City's urban forest.</p> <ul style="list-style-type: none"> <li>• Maintain and expand the City's urban tree canopy to meet the City's Climate Action Plan goals.</li> <li>• Incorporate considerations for a changing climate into urban forestry management and planning. Update the Urban Forestry Program 5 Year Plan with consideration for tree species diversification, salt tolerance, and irrigation needs.</li> </ul>	<p>As described in Table 2, the Project would expand the City's urban forest to exceed the CAP Consistency Regulation requirements for trees. The current landscape plan identifies 1,075 trees on site, which would exceed the required 858 trees. An additional 355 trees are identified in the roadway ROW. The Project would be consistent with the City's Urban Forestry Program, including tree species selection. Because landscaping would only incorporate tree species allowable under City standards, species diversification, salt tolerance, and irrigation needs would be consistent with current urban forestry goals. The Project would not interfere with future updates. Future landscape modifications or tree plantings would be subject to future program requirements as updated at the time of implementation. The Project would not conflict with this Climate Resilient SD Plan policy.</p>
<p>Policy CCS-2: Secure and maintain water and wastewater supplies and services.</p> <ul style="list-style-type: none"> <li>• Continue to update the Urban Water Management Plan every five years to reexamine future vulnerabilities to the City water supply.</li> </ul>	<p>This policy pertains to actions and improvements initiated by the City that are not applicable to the Project. However, as discussed in Section 5.12, Public Utilities, of the SEIR prepared for the Project, the Project would not interfere with</p>

**Table 3. Climate Resilient SD Plan Consistency**

Policies	Project Consistency
<ul style="list-style-type: none"> <li>• Continue efforts to diversify the City’s water supply sources and reduce dependence on imported water.</li> <li>• Promote stormwater as a resource concept by implementing capture and reuse technologies where feasible.</li> <li>• Replace or rehabilitate water and wastewater pipes to maintain a state of good repair, minimize breaks and ensure structural integrity in the face of climate change hazards such as flooding.</li> <li>• As Water Design Guidelines and Sewer Design Guidelines are updated, consider climate change impacts, such as sea level rise, coastal erosion and changes in precipitation.</li> <li>• Account for projected changes in precipitation and sea level rise in water and wastewater planning.</li> <li>• Prepare and implement a facility climate change action plan for Point Loma Wastewater Treatment Plant.</li> <li>• Continue efforts to increase wastewater diversion to further reduce likelihood of sanitary sewer overflow.</li> <li>• Conduct detailed site assessments at active, identified vulnerable waste and wastewater facilities and identify climate change hazard risk mitigation options.</li> <li>• Integrate projected increases in wildfire frequency and intensity into watershed management and planning, dam and raw water reservoir operations and dam emergency planning, in alignment with City’s Climate Action Plan.</li> <li>• Promote water conservation through updates to the City irrigation system.</li> </ul>	<p>implementation of City water and wastewater planning efforts or improvements to City infrastructure outside the Project site. Water and wastewater infrastructure plans have been prepared for the Project to provide improved infrastructure to the site, including pipelines, to adequately serve the proposed development. Project landscaping would comply with all City irrigation requirements, including installation of permanent below-grade irrigation systems. The Project would not conflict with this Climate Resilient SD Plan policy.</p>
<p>Policy CCS-3: Improve ability of infrastructure and built systems to withstand climate change shocks and stressors, while maintaining provision of essential services.</p> <ul style="list-style-type: none"> <li>• Provide cooling systems for City assets and equipment sensitive to overheating.</li> </ul>	<p>This policy pertains to actions and improvements initiated by the City that are not applicable to the Project. However, the Project would provide new urban canopies to reduce heat island effect as discussed in the Specific Plan (Specific Plan Chapter 6, Parks and Public Space Framework, and</p>



**Table 3. Climate Resilient SD Plan Consistency**

Policies	Project Consistency
<ul style="list-style-type: none"> <li>• Plan for a climate ready transportation network.</li> <li>• Identify and implement flood protection measures for critical infrastructure.</li> <li>• Protect mechanical, electrical and other key operational equipment from flooding at critical facilities through facility improvements or adaptive action.</li> <li>• Conduct site assessments at City facilities and ensure effective management of vegetation, defensible space and hardening of assets as feasible for wildfire preparedness.</li> </ul>	<p>Appendix D, Plant Palette), new non-motorized transportation facilities as discussed in the LMA (SEIR Appendix D1), and new stormwater drainage infrastructure to protect new development from flooding as discussed in Section 5.7, Hydrology/Water Quality, of the SEIR prepared for the Project. The Project would not include critical emergency support facilities, such as hospitals, and would not interfere with City site assessments for wildfire preparedness as discussed in Section 5.6, Health and Safety, of the SEIR prepared for the Project. The Project would not conflict with this Climate Resilient SD Plan policy.</p>

**Source:** City of San Diego 2021.

**Notes:** CAP = Climate Action Plan

As shown in Table 3, the Project would support implementation of relevant Climate Resilient SD Plan policies and would not conflict with Climate Resilient SD Plan policies. Therefore, the Project would be consistent with the Climate Resilient SD Plan.

### 4.2.3 2021 San Diego Forward: The Regional Plan

The Project is located in a TPA and would implement a Specific Plan that has been drafted to support of policy objectives in SANDAG’s 2021 Regional Plan in a location mapped as a TPA. As discussed in Table 2, the Project would provide new transit-supporting density and design, including mixed-use development and new parks and pedestrian and bicycle facilities that connect all internal site uses and adjacent properties. Project implementation would create a multi-use urban path along Sports Arena Boulevard and a promenade and bikeway along the extension of Kemper Street on the Project site to enhance the public realm and implement a portion of the pedestrian and bicycle improvements associated with the Bay-to-Bay Link. Project improvements include a Class I multi-use path along the majority of the southern side of Kurtz Street and along the southeastern side of Rosecrans Street to provide a connection to the Old Town Transit Center via walking and biking. As described in Table 2, the Project applicant would coordinate with SANDAG and the MTS to construct a bus stop to be used for future Bus Rapid Transit service to create a strong transit connection to the Old Town Transit Center, Mission Bay, and inland communities. A timeline has not been established for future Bus Rapid Transit. However, Bus Rapid Transit service to the area is identified as part of the near term (by 2035) transportation network in the 2021 Regional Plan and Draft Proposed 2025 Regional Plan Transportation Network (SANDAG 2021, 2024). The Project would not conflict with implementation of the 2021 Regional Plan. Rather, the Project would implement growth in a TPA, consistent with the SANDAG’s Sustainable Communities Strategy. The Project would implement new multi-modal transportation facilities in accordance with the 2021 Regional Plan network for the area to be a

central mobility hub, including new bicycle and pedestrian facilities and improvements to support future Bus Rapid Transit Service.

#### **4.2.4 2022 Climate Change Scoping Plan**

The 2022 Scoping Plan provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The 2022 Scoping Plan is not directly applicable to specific projects. The Project would comply with all applicable regulations adopted at the state level in furtherance of the 2022 Scoping Plan to the extent required by law, such as increasingly stringent Title 24 energy efficiency requirements. Additionally, Appendix D to the 2022 Scoping Plan, Local Actions, encourages the development of local climate action plans that meet the requirements of CEQA Guidelines Section 15183.5(b), as the appropriate tool for determining project consistency with statewide emissions reduction goals. As described previously, the 2022 CAP is consistent with CEQA Guidelines Section 15183.5(b), and outlines a path to achieve Citywide carbon neutrality, consistent with the 2022 Scoping Plan. As such, the City’s 2022 CAP demonstrates the City’s efforts to comply with statewide GHG emissions reductions, and a Project that is consistent with the 2022 CAP would also be consistent with the 2022 Scoping Plan. As shown in Table 2, the Project has demonstrated consistency with the goals of the 2022 CAP and, therefore, would be consistent with statewide emissions reduction goals. The Project would be consistent with key 2022 Scoping Plan strategies, including reducing vehicle miles traveled through land use and transportation improvements, decarbonizing buildings through electrification and participation in San Diego Community Power, and increasing electric vehicle (EV) infrastructure pursuant to the California Green Building Code. The Project would improve the local transit and active transportation network by providing new protected non-motorized travel facilities, improvements at two existing bus stops, and a new bus stop for future Bus Rapid Transit service. The Project would include new green spaces and an urban tree canopy, consistent with 2022 Scoping Plan strategies relating to carbon removal and sequestration. Therefore, the Project would be consistent with CARB’s 2022 Scoping Plan.

Impacts related to plan consistency would be **Less than Significant**.

## Section 5 Cumulative Impacts

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The potential for a significant GHG impact is limited to cumulative impacts because the relatively small levels of emissions generated by an individual project are not expected to result in significant direct impacts with respect to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG impacts from combined new development under buildout of the 2018 Community Plan and Navy Old Town Campus Revitalization Project could result in significant cumulative impacts with respect to climate change. As summarized in Section 4.1, implementation of the Project would be consistent with the 2022 CAP, which is a plan to address cumulative Citywide GHG emissions, and would not result in significant GHG emissions. The City's 2022 CAP is intended to capture the City's fair share of emission reductions from cumulative statewide emissions to achieve statewide emissions reduction targets from development within the City's jurisdiction. A significant cumulative impact related to statewide emissions targets may occur as result of projects that are not included in the City/CAP jurisdiction (for example, the Navy Old Town Campus Revitalization Project). However, the Project is consistent with the City's 2022 CAP, and it, thus, is consistent with the City's less than cumulatively considerable contribution to statewide emissions (City of San Diego 2022b). Therefore, the Project's contribution would **Not be Cumulatively Considerable**.

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## Section 6 References

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- CAPCOA (California Air Pollution Control Officers Association). 2022. "Appendix G: Default Data Tables." In California Emissions Estimator Model Users Guide. Version 2022.1. April. Accessed March 2025. [https://www.caleemod.com/documents/user-guide/01\\_User%20Guide.pdf](https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf).
- CARB (California Air Resources Board). 2022a. California Greenhouse Gas Emissions for 2000 to 2020, Trends of Emissions and Other Indicators. October 26. Accessed March 2025. [https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf).
- CARB. 2022b. 2022 Scoping Plan for Achieving Carbon Neutrality. December. Accessed March 2025. <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.
- CARB. 2024. Advanced Clean Cars Summary. Accessed March 2025. [https://ww2.arb.ca.gov/sites/default/files/2019-12/acc%20summary-final\\_ac.pdf](https://ww2.arb.ca.gov/sites/default/files/2019-12/acc%20summary-final_ac.pdf).
- City of San Diego. 2008. City of San Diego General Plan, as amended. Adopted by City Council on March 10, under Resolution No. R-303473. Accessed March 2025. <https://www.sandiego.gov/planning/genplan>.
- City of San Diego. 2021. Climate Resilient SD Plan. Accessed March 2025. <https://www.sandiego.gov/climate-resilient-sd/plan>.
- City of San Diego. 2022a. City of San Diego Climate Action Plan. Accessed March 2025. [https://www.sandiego.gov/sites/default/files/san\\_diegos\\_2022\\_climate\\_action\\_plan\\_0.pdf](https://www.sandiego.gov/sites/default/files/san_diegos_2022_climate_action_plan_0.pdf).
- City of San Diego. 2022b. Addendum to an Environmental Impact Report – City of San Diego Climate Action Plan Update. Addendum to EIR No. 416603, SCH No. 2015021053.
- City of San Diego. 2022c. Agenda of April 26, 2022: Item #5, Climate Action Plan Consistency Regulations. April 21.
- City of San Diego. 2022d. Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects. June 17.
- City of San Diego. 2022e. California Environmental Quality Act Significance Determination Thresholds. Planning Department. September.
- City of San Diego. 2023. San Diego All-Electric Reach Code Discussion Draft. April 12.
- City of San Diego. 2024a. San Diego Municipal Code, as amended. Accessed March 2025. <https://www.sandiego.gov/city-clerk/officialdocs/municipal-code>.
- City of San Diego. 2024b. City of San Diego Mapping and Geographic Information, Transit Priority Areas Map. Accessed March 2025. <https://www.sandiego.gov/planning/work/mapsua/map>.
- City of San Diego. 2024c. Stormwater Quality Management Plan for the Midway Rising Project.
- Kimley-Horn (Kimley-Horn and Associates, Inc.). 2024. Midway Rising Local Mobility Analysis. June.

- NOAA (National Oceanic & Atmospheric Administration). 2023. "Basics of the Carbon Cycle and the Greenhouse Effect." Earth System Research Laboratories, Global Monitoring Laboratory. Accessed March 2025. [https://gml.noaa.gov/outreach/carbon\\_toolkit/](https://gml.noaa.gov/outreach/carbon_toolkit/).
- PDC (Project Design Consultants). 2024. Tentative Map for Midway Rising – Landscape Development Plan.
- SANDAG (San Diego Association of Governments). 2021. 2021 Regional Plan. December. Accessed March 2025. <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/final-2021-regional-plan-flipbook.pdf>.
- SANDAG. 2024. 2025 Regional Plan Transportation Network. Draft Proposed. September. Accessed March 2025. <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2025-regional-plan/2025-draft-proposed-regional-transportation-network-eng.pdf>.
- USEPA (U.S. Environmental Protection Agency). 2025a. "Overview of Greenhouse Gases." Updated January 16. Accessed March 2025. <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>.
- USEPA. 2025b. "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022." EPA 430-D-24-001. Updated January 15. Accessed March 2025. <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>.