

## MEMORANDUM

Date: January 16, 2025

To: San Diego County Regional Airport Authority

From: Mark R. Johnson 

Subject: SAN DIEGO INTERNATIONAL AIRPORT LAND USE COMPATIBILITY PLAN UPDATE – DEVELOPMENT DISPLACEMENT ANALYSIS RESULTS

The draft Airport Land Use Compatibility Plan Update (ALUCP Update) for San Diego International Airport (the Airport) is a proposed “project” subject to the California Environmental Quality Act (CEQA).<sup>1</sup> The ALUCP Update is a land use plan and does not involve or propose any specific development projects; therefore, any environmental impacts attributable to the ALUCP Update would stem from changes in local agency land use plans and regulations, which would directly affect future development.

The analysis of potentially displaced development quantifies the amount of future development, described as dwelling units and nonresidential floor area (gross occupancy area [GOA]),<sup>2</sup> that could potentially be displaced from areas subject to more restrictive land use controls after implementation of the ALUCP Update. It also quantifies the amount of land that would no longer be available for the development of certain noise-sensitive land uses within the 65 decibel (dB) Community Noise Equivalent Level (CNEL) and 75 dB CNEL noise contours.

### Summary of Results

This analysis determined that potential development displacement could occur because of the increased size of the noise contours, changes to the boundaries of Safety Zone 1, and the change in airspace protection height limits. The results are as follows:

- The change in noise contours would render 20 parcels totaling 7.4 acres, all in the Downtown Community Planning Area (CPA), unavailable for the development of selected noise-sensitive land uses.<sup>3</sup> This equates to 0.97 percent of all land zoned for these uses in the Downtown CPA.
- The change in Safety Zone 1 boundaries would affect 10 parcels, plus the Solar Turbines facility on Port District property, potentially displacing up to 272,672 square feet of GOA. The 10 parcels have a total land area of 5.9 acres, divided among two zoning districts and one specific plan area. The affected parcels represent 3.2 percent of the commercial designated property in the NTC Specific Plan, 0.7

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<sup>1</sup> Muzzy Ranch v. Solano County Airport Land Use Commission, 41 Cal.4th 372, June 21, 2007.

<sup>2</sup> Gross occupancy area is the “total amount of floor area (measured in square feet) contained within a building measured to the external walls, as well as any attached patios, decks, or balconies and other outdoor spaces for dining or public gathering.” See the draft Airport Land Use Compatibility Plan Update for San Diego International Airport, page 1-18, June 2024.

<sup>3</sup> Those uses include places of assembly for children, child day care centers, children’s schools, hospitals, and other medical facilities.

percent of IS-1-1-zoned land in the Midway-Pacific Highway CPA, and 2.8 percent of CCPD-MC-zoned land in the Downtown CPA.

- The change in airspace protection height limits would result in the potential displacement of 665 future dwelling units, a decrease of 0.38 percent in the number of dwelling units that could be built on sites identified by the City of San Diego in its Adequate Sites Inventory for 2021 through 2029.

## Potential Causes of Displacement

The ALUCP Update includes policies and standards addressing four land use compatibility factors – noise, safety, airspace protection, and overflight. The updated noise, safety, and airspace policies have the potential to displace future development. The overflight policies include no land use restrictions, only real estate disclosure and residential property buyer notification measures.

### NOISE COMPATIBILITY POLICIES AND STANDARDS

The noise policies and standards remain the same as those of the 2014 ALUCP; however, the sizes of the updated noise contours differ in the ALUCP Update. **Exhibits 1** and **2** depict the noise contours from the 2014 ALUCP and ALUCP Update on the east and west sides of the Airport, respectively. Four sets of changes are relevant to the displacement analysis:

- areas newly exposed to noise above 65 dB CNEL
- areas newly exposed to noise above 75 dB CNEL
- areas no longer exposed to noise above 65 dB CNEL
- areas no longer exposed to noise above 75 dB CNEL

New development of the following land uses is incompatible within the 65 dB CNEL contour:

- Assembly – Children (Instructional Studio, Cultural Heritage School, Religious, Other)
- Child Day Care Center, Pre-Kindergarten
- Medical Care – Congregate Care Facility
- Medical Care – Hospital
- Medical Care – Out-Patient Surgery Center
- School for Children – Kindergarten through Grade 12
- Entertainment Facility – Outdoor

New development of the following land uses is incompatible within the 75 dB CNEL contour:

- Conference/Convention Center
- School for Adults – College, University, Vocational/Trade School
- Arena, Stadium, Fairground
- Botanical Garden, Arboretum, Zoological Park

- Campground

The potential impact of the ALUCP Update on future development relates to changes in the lands available for development of (1) noise-sensitive land uses incompatible within the 65 dB CNEL contour and (2) additional land uses incompatible within the 75 dB CNEL contour.

## **SAFETY COMPATIBILITY POLICIES AND STANDARDS**

The boundaries of Safety Zone 1 are proposed to be changed to correspond with the updated Runway Protection Zones (RPZs) in the latest Airport Layout Plan. **Exhibit 3** depicts existing land use and the updated boundaries of Safety Zone 1 compared with the boundaries in the 2014 ALUCP on the east side of the Airport. Several parcels are inside the modified Safety Zone 1, all of which were in Safety Zone 2 in the 2014 ALUCP. The west part of Parcel 20 is removed from Safety Zone 1 and added to Safety Zone 5 in the ALUCP Update. **Exhibit 4** depicts the existing zoning in modified Safety Zone 1.

**Exhibit 5** illustrates Safety Zone 1, existing land use, and future land use designations from the Naval Training Center (NTC) Precise Plan on the west side of the Airport.

In Safety Zone 1, both the 2014 ALUCP and ALUCP Update consider structures (other than those required for aeronautical purposes) to be incompatible and stipulate that reconstruction of existing uses in Safety Zone 1 would be compatible only if the original structure is destroyed by a calamity (such as fire, earthquake, or flood). They also stipulate that remodeling or partial reconstruction would be compatible if no more than 50 percent of the exterior walls were removed and there is no increase in building footprint or GOA.

Additional policies proposed in the ALUCP Update for existing buildings in Safety Zone 1 include:

- The existing land use cannot be changed to any use classified as incompatible in Safety Zone 2.
- The intensity of use must not exceed what it was prior to remodeling, partial reconstruction, or land use change.

The first bulleted policy would have no effect on buildings brought into the updated Safety Zone 1 as all are currently in Safety Zone 2. The second bulleted policy would be the cause of any ALUCP-related impact. That impact would be a reduction in the potential GOA and intensity of use of properties brought into Safety Zone 1.

## **AIRSPACE PROTECTION POLICIES AND STANDARDS**

The ALUCP Update alters the boundaries within which the maximum height limits of the 2014 ALUCP apply. The 2014 ALUCP limited heights of proposed buildings to the elevation of the threshold siting surface (TSS) off each runway end. The ALUCP Update applies the maximum height limits to the runway end siting surfaces (RESS) and one engine inoperative (OEI) surfaces. Those surfaces are shown on **Exhibit 6**.

On the west side of the Airport, the proposed change will have no effect. That area is within the Coastal Height Overlay Zone, where maximum building heights are limited to 30 feet above the ground, below the airspace surfaces.

On the east side of the Airport, height limits in most of the RESS/OEI are more restrictive than the TSS that is in the 2014 ALUCP, resulting in a reduction of the maximum heights of potential future construction. Based on the applicable zoning and the development trends in the area over the past several years, residential would be the land use most likely displaced by a reduction in allowable building heights.

The RESS and OEI surfaces are narrower than the TSS in the 2014 ALUCP. On the east side of the Airport, parcels within the TSS, but outside the RESS/OEI surfaces, would be subject to the following less restrictive height limits with the ALUCP Update:

- In most of the Downtown Community Planning Area (CPA), the overlying US Standard for Terminal Instrument Procedures (TERPS) Surfaces<sup>4</sup> would be the effective maximum height limit.<sup>5</sup>
- On the east side of the Airport outside the Downtown CPA, the lower of (1) the TERPS surfaces or (2) the maximum building height consistent with the applicable floor area ratio (FAR) would be the effective maximum height limit.

The impact of the revised height limits on future development in the RESS/OEI would be the net change in the potential number of dwelling units that could be built on the east side of the Airport.

## Development Displacement Attributable to Changes in Noise Contours

The amount of land that would become unavailable for the development of noise-sensitive land uses with the ALUCP Update was the subject of this analysis.

Potential redevelopment sites were identified by removing the following properties from the County Assessor's database of all parcels within the areas of noise exposure change depicted on Exhibits 1 and 2.

- properties developed in accordance with an approved Specific Plan or Precise Plan
- properties developed for single-unit dwellings in residential single unit (RS-1) zoning districts
- properties designated as historic
- parks, golf courses, and dedicated open space
- purpose-built places of worship, including their grounds and support buildings
- fire and police stations and government buildings
- universities and colleges, including playing fields
- Kindergarten through Grade 12 schools, including playgrounds and playing fields

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<sup>4</sup> These are approach and departure surfaces defined in accordance with Federal Aviation Administration (FAA) Order 8260.3F, *United States Standard for Terminal Instrument Procedures (TERPS)*, September 7, 2023. The TERPS surfaces set an indirect height limit. Any proposed structures penetrating a TERPS surface would likely be issued a Determination of Hazard (DOH) by the FAA. Any proposed structure receiving a DOH would be incompatible with both the 2014 ALUCP and the ALUCP Update.

<sup>5</sup> Between California Street and Pacific Highway and south of Laurel Street to Ivy Street, the City of San Diego has set the maximum height limit at 60 feet. South of Ivy to Ash Street, the maximum height limit is 85 feet. See San Diego Municipal Code, Article 6, Planned Districts, Division 3, Centre City Planned District, Figure F, Building Height and Sun Access.

- public utilities, such as power substations and water treatment plants
- property owned by the United States government
- properties in the Downtown CPA developed since 2014<sup>6</sup>

The City of San Diego’s zoning provisions were reviewed to determine the noise-sensitive land uses permitted in the zoning districts within the areas of noise exposure change. Minimum practical lot size thresholds were assigned to each use, based on a study undertaken for the Environmental Impact Report for the 2014 ALUCP.<sup>7</sup> **Table 1** lists the uses permitted in the noise impact study area and the practical minimum lot sizes for each.<sup>8</sup>

**TABLE 1 NOISE-SENSITIVE LAND USES PERMITTED IN NOISE IMPACT STUDY AREA**

NOISE-SENSITIVE LAND USE <sup>1</sup>	INCOMPATIBLE DNL NOISE LEVEL	MINIMUM PRACTICAL LOT SIZE (SQUARE FEET) <sup>2</sup>
Assembly – Children (Instructional Studio, Cultural Heritage School, Religious, Other)	Above 65 dB CNEL	7,500
Child Day Care Center, Pre-Kindergarten	Above 65 dB CNEL	none
Medical Care – Congregate Care Facility	Above 65 dB CNEL	44,000
Medical Care – Hospital	Above 65 dB CNEL	44,000
Medical Care – Out-Patient Surgery Center	Above 65 dB CNEL	44,000
School for Children – Kindergarten through Grade 12	Above 65 dB CNEL	20,000
School for Adults – College, University, Vocational/Trade School	Above 75 dB CNEL	10,000

NOTES:

- 1 This list includes only land uses permitted in the zoning districts within the noise impact study area. It excludes any land use designated in the City Zoning Code as “limited” or “conditional.”
  - 2 Minimum practical lot sizes were determined based on a study undertaken for the Environmental Impact Report for the 2014 ALUCP.
- SOURCE: Ricondo & Associates, Inc., October 2024.

**Table 2** presents the results of the analysis. Twenty parcels would be affected by the change in noise contours with the ALUCP Update, all of which would become unavailable for child day care centers and pre-

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<sup>6</sup> Property developed since 2014 was presumed to have substantial value and many remaining years of economic life, making them unlikely for redevelopment. Records of recent construction in the Downtown CPA are organized by the City Planning Department for easy retrieval and analysis. In other CPAs, recent construction can be identified only by searching and filtering the on-line permit records and then manually reviewing the selected records. While this was beyond the scope of the analysis, this omission has no effect on the analysis as no noise-related displacement was found in any CPA other than Downtown.

<sup>7</sup> San Diego County Regional Airport Authority, Airport Land Use Commission, *Draft Environmental Impact Report for the San Diego International Airport Land Use Compatibility Plan*, Appendix A, Revised Analysis of Potentially Displaced Development: San Diego International Airport Land Use Compatibility Plan, Attachment E, July 2013.

<sup>8</sup> The following noise-sensitive land uses are not permitted in any zoning districts in the noise impact study area: entertainment facility – outdoor; conference/convention center; arena, stadium, fairground; botanical garden, arboretum, zoological park; and campground.

kindergartens. Six of the parcels would become unavailable for other children’s assembly uses, one parcel for medical care uses, and four parcels for schools for children.

**TABLE 2 PROPERTIES MADE UNAVAILABLE FOR THE DEVELOPMENT OF NOISE-SENSITIVE LAND USES WITH THE ALUCP UPDATE**

APN <sup>1</sup>	NOISE-SENSITIVE LAND USE <sup>2</sup>				PARCEL SIZE (SQ FT)
	ASSEMBLY-CHILDREN	CHILD DAY CARE, PRE-KINDERGARTEN	MEDICAL CARE <sup>3</sup>	SCHOOL FOR CHILDREN	
5335821100	--	+	--		2,706
5333110300	--	+	--		3,018
5332320300	--	+	--		4,693
5332320200	--	+	--		4,767
5332240400	--	+	--		4,990
5332240300	--	+	--		4,991
5335820900	--	+	--		5,010
5332230806	--	+	--		5,015
5332230300	--	+	--		5,025
5332320100	--	+	--		6,273
5335830200	--	+	--		6,705
5332240100	+	+	--		9,987
5332231400	+	+	--		10,040
5340220400	--	+	--		10,423
5332321800	+	+	--		14,072
5333111200	+	+	--		18,078
5332240200	+	+	--	+	29,948
5340210559	--	+	--	+	36,157
5332311737	--	+	--	+	59,132
5333111400	+	+	+	+	81,513
<b>Total Affected Properties</b>	<b>6</b>	<b>20</b>	<b>1</b>	<b>4</b>	<b>322,543</b>
<b>Affected Land Area</b>	<b>3.76 ac</b>	<b>7.40 ac</b>	<b>1.87 ac</b>	<b>4.75 ac</b>	<b>7.40 ac</b>

NOTES:

- 1 Assessor’s Parcel Number.
- 2 These are the only noise-sensitive land uses permitted in the zoning districts within the noise impact study area. Land uses designated in the City Zoning Code as “limited” or “conditional” are not included.
- 3 Includes hospitals, congregate care facilities, and outpatient surgery centers.

SOURCE: Ricondo & Associates, Inc., October 2024.

**Exhibit 7** depicts the affected lots, indicating which would be unavailable for each noise-sensitive land use. All are in the Little Italy and Cortez neighborhoods in the Downtown CPA. Outside the Downtown CPA, no

zoning districts within the area impacted by the larger 65 dB CNEL permit these noise-sensitive uses by right.

### Scale of Impact – Noise Policy

The affected land uses are institutional and public service uses which are developed infrequently compared with the most common land uses, such as residential and commercial. Many other sites are potentially available for these land uses. In the Downtown CPA, 765.5 acres are zoned to permit these land uses.<sup>9</sup> The land made unavailable for the identified noise-sensitive land uses represents 0.97 percent of this area.

### Development Displacement Attributable to Changes in Safety Zone 1

**Table 3** presents the potential development displacement that could occur with the modification of Safety Zone 1. The second column presents the estimated GOA of all buildings and parts of buildings in the modified Safety Zone 1, which is the maximum GOA that would be compatible under the updated ALUCP. The third column presents the maximum potential GOA that could be built on each site based on the 2014 ALUCP, where the parcels are all in Safety Zone 2. The fourth column presents the difference between the existing GOA and the potential GOA based on the 2014 ALUCP. That difference, totaling 272,672 square feet, is the maximum potential displacement of GOA with the ALUCP Update.

With the ALUCP Update, replacing existing land uses with more intensely occupied land uses would be incompatible in Safety Zone 1. The last column of Table 3 lists generalized land uses permitted by City zoning that would be precluded from being developed under the ALUCP Update because they would be more intensely occupied than the existing land uses.

Note that no land use would be precluded from occupying the existing building on Parcel 2. It is currently a meeting place, which has the most intense occupancy factor (60 square feet per person) among the uses that would be permitted in commercially designated areas by the NTC Precise Plan. Any replacement uses would be of equal or less intensity than the existing use.

One more parcel merits discussion. Parcel 20 is occupied by the Solar Turbines manufacturing plant, which is on property controlled by the San Diego Unified Port District (Port District). It is the only building complex within Safety Zone 1 based on the 2014 ALUCP. The property is unzoned by the City as it is subject to development control by the Port District (see Exhibit 4). According to the Port District Master Plan, the Solar Turbines area is designated for maritime services and industrial use.<sup>10</sup> The ALUCP Update would limit future use of the Solar Turbines buildings to manufacturing or less intensive uses, such as warehousing (see Table 3-1 of the ALUCP Update).

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<sup>9</sup> These include five zones in the Centre City Planned District (CCPD): CCPD-ER (employment/residential mixed use), CCPD-MC (mixed commercial), CCPD-NC (neighborhood commercial), CCPD-PC (public/civic) and CCPD-RE (residential emphasis).

<sup>10</sup> San Diego Unified Port District, *Port Master Plan, San Diego Unified Port District*, Final Draft, Figure PD3.2, December 2023. On February 28, 2024, the Port District certified the Environmental Impact Report and approved the Master Plan. It is awaiting certification by the California Coastal Commission (<https://www.portofsandiego.org/waterfront-development/port-master-plan-update>, accessed October 21, 2024).

**TABLE 3 POTENTIAL DISPLACEMENT ATTRIBUTABLE TO CHANGES IN SAFETY ZONE 1 BOUNDARY**

MAP ID <sup>1</sup>	EXISTING GOA <sup>2</sup> (SQ FT)	POTENTIAL GOA WITH 2014 ALUCP	POTENTIAL DISPLACED GOA WITH ALUCP UPDATE	EXISTING GENERALIZED LAND USE	EXISTING ZONING <sup>3</sup>	GENERALIZED LAND USES PRECLUDED WITH ALUCP UPDATE <sup>4</sup>
1	1,225	2,450	1,225	Office	NTC Precise Plan - Commercial	<ul style="list-style-type: none"> <li>▪ Retail</li> <li>▪ Service-Medium Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> <li>▪ Adult Assembly</li> </ul>
2	579	1,158	579	Adult Assembly	NTC Precise Plan - Commercial	<ul style="list-style-type: none"> <li>▪ None</li> </ul>
3	4,888	9,776	4,888	Manufacturing	NTC Precise Plan - Commercial	<ul style="list-style-type: none"> <li>▪ Office</li> <li>▪ Retail</li> <li>▪ Service-Low Intensity</li> <li>▪ Service-Medium</li> <li>▪ Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> <li>▪ Adult Assembly</li> </ul>
14	1,960	5,110	3,150	Service – Low Intensity	IS-1-1	<ul style="list-style-type: none"> <li>▪ Office</li> <li>▪ Retail</li> <li>▪ Service-Medium</li> <li>▪ Intensity</li> <li>▪ Service-High Intensity</li> </ul>
15	1,884	3,971	12,087	Service – Low Intensity	IS-1-1	<ul style="list-style-type: none"> <li>▪ Office</li> <li>▪ Retail</li> <li>▪ Service-Medium</li> <li>▪ Intensity</li> <li>▪ Service-High Intensity</li> </ul>
21	1,516	71,553	70,037	Service – Low Intensity	CCPD-MC	<ul style="list-style-type: none"> <li>▪ Residential</li> <li>▪ Office</li> <li>▪ Retail</li> <li>▪ Service-Medium Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> </ul>
22	1,245	1,245	0	Office	CCPD-MC	<ul style="list-style-type: none"> <li>▪ Residential</li> <li>▪ Retail</li> <li>▪ Service-Medium Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> </ul>
23	6,797	59,403	52,606	Warehousing	CCPD-MC	<ul style="list-style-type: none"> <li>▪ Residential</li> <li>▪ Office</li> <li>▪ Retail</li> <li>▪ Service-Low Intensity</li> <li>▪ Service-Medium Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> </ul>
24	5,649	101,776	96,127	Service – Low Intensity	CCPD-MC	<ul style="list-style-type: none"> <li>▪ Residential</li> <li>▪ Office</li> <li>▪ Retail</li> <li>▪ Service-Medium Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> </ul>
26	7,698	39,671	31,973	Hotel	CCPD-MC	<ul style="list-style-type: none"> <li>▪ Residential</li> <li>▪ Retail</li> <li>▪ Service-Medium Intensity</li> <li>▪ Service-High Intensity</li> <li>▪ Theater</li> </ul>
<b>Totals</b>	<b>33,441</b>	<b>306,113</b>	<b>272,672</b>			

NOTES:

- 1 See Exhibit 3 for Parcels 14 through 26. See Exhibit 5 for Parcels 1, 2, and 3.
- 2 GOA means gross occupied area, the "total amount of floor area (measured in square feet) contained within a building measured to the external walls, as well as any attached patios, decks, or balconies and other outdoor spaces for dining or public gathering." See the draft Airport Land Use Compatibility Plan Update for San Diego International Airport, page 1-18, June 2024.
- 3 NTC – Naval Training Center; IS – Industrial, Small Scale; CCPD-MC – Centre City Planned District, Mixed Commercial.
- 4 These land uses have higher intensities than each existing land use. See Table 3-1 in the draft Airport Land Use Compatibility Plan Update for San Diego International Airport, June 2024.

SOURCE: Ricondo & Associates, Inc., October 2024.



As depicted on Exhibit 3, the change in the Safety Zone 1 boundary would shift part of the Solar Turbines building complex from Safety Zone 1 to Safety Zone 5. Other buildings or parts of buildings would be moved into Safety Zone 1 from Safety Zone 2. The change in GOA in each area is as follows:

- shifted out of Safety Zone 1 to Safety Zone 5 – 24,833 square feet
- shifted into Safety Zone 1 from Safety Zone 2 – 67,813 square feet
- net increase in GOA in Safety Zone 1 – 42,980 square feet

### Scale of Impact – Safety Policy

The ten parcels that would be impacted by the change in the boundaries of Safety Zone 1, excluding the Solar Turbines property, total 5.9 acres. This is a small area relative to all properties zoned the same in the affected CPA or neighborhood. As indicated in Table 4, the impacted properties equate to 3.2 percent of all properties in the NTC Specific Plan designated for commercial use, 0.7 percent of all land zoned IS-1-1 in the Midway-Pacific Highway CPA, and 2.8 percent of properties zoned CCPD-MC in the Downtown CPA.

TABLE 4 SCALE OF IMPACT – CHANGE IN SAFETY ZONE 1 BOUNDARY

PARCEL NUMBER	CPA, SPECIFIC PLAN AREA	ZONING, LAND USE DESIGNATION	TOTAL LAND AREA IN CPA/SPECIFIC PLAN AREA, BY ZONE (ACRES)	PARCEL AREA (ACRES)	PERCENTAGE OF TOTAL LAND AREA AFFECTED
1-3	NTC Specific Plan	NTC-Commercial	68.4	2.22	3.2
14-15	Midway-Pacific Highway	IS-1-1	90.2	0.65	0.7
21-24, 26	Downtown	CCPD-MC	109.3	3.03	2.8
Total				5.90	

NOTES: CPA – Community Planning Area; NTC – Naval Training Center.  
 SOURCE: Ricondo & Associates, Inc., November 2024

## Development Displacement Attributable to Proposed Airspace Protection Height Limits

The study area for the airspace displacement analysis is the land beneath the TSS, RESS, and OEI surfaces depicted on Exhibit 6. The portion of the study area on the west side of the Airport will be unaffected by the change in maximum height limits proposed in the ALUCP Update. The Coastal Height Overlay Zone sets a maximum height limit of 30 feet above finished grade throughout that area.<sup>11</sup> The airspace surfaces

<sup>11</sup> San Diego Municipal Code, Section 132.0505.

comprising the ALUCP Update height limits are higher than 30 feet above the ground on the west side of the Airport for all but one parcel.<sup>12</sup>

### Potentially Developable Property

Before undertaking this analysis, it was necessary to identify property with the potential to be developed or redeveloped within the study area. It was decided to use the City's Adequate Sites Inventory for this purpose. The Adequate Sites Inventory identifies property within the City's land use jurisdiction with the potential for housing development during the 2021-2029 Housing Element period.<sup>13</sup>

As background, and pursuant to state housing laws, the City is required to identify sites for housing with an overall capacity adequate to meet its Regional Housing Needs Assessment (RHNA) target of 108,036 housing units for 2021 through 2029. The Adequate Sites Inventory demonstrates that, based on the City's current land use plans and zoning regulations, there is capacity for at least 174,673 housing units.<sup>14</sup>

The Adequate Sites Inventory is based on a robust analysis described in Appendix D of the City's Housing Element, which was adopted by the City in June 2020 and certified by the State's Department of Housing and Community Development in September 2021. The following excerpt summarizes the methodology and approach taken by the City in developing the Adequate Sites Inventory.

The City determines its housing capacity through a comprehensive review of vacant and non-vacant developable land throughout the City that may reasonably develop within the Housing Element planning period. The City of San Diego broadly inventory [sic] potentially developable land throughout the City. This approach has been adopted in acknowledgment that many factors affect housing development feasibility, trends, and developer and property owner choices within the City, and that the City cannot mandate housing development on private property or property owned by other government agencies.

The 6th Cycle Adequate Sites Inventory process has utilized multiple data sets combined with specified site criteria to identify sites where planned/zoned residential capacity can realistically be achieved. Further analyses of recent building permit data as well as community-specific constraints and opportunities have been used to inform assumptions made for the housing capacity of sites identified as developable. This assessment utilized SanGIS parcel data, City/San Diego Association of Governments (SANDAG) Series 14 land use capacity data; City land use designation, Environmentally Sensitive Lands (ESL), Multi-Habitat Planning Area (MHPA, i.e. conserved open space), historical resources, zoning, and

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<sup>12</sup> The highest terrain on one parcel is within 28 feet of the overlying airspace surface.

<sup>13</sup> City of San Diego, *City of San Diego General Plan, Housing Element 2021-2029*, Appendix HE-D, Adequate Sites Inventory.

<sup>14</sup> City of San Diego, *City of San Diego General Plan, Housing Element 2021-2029*, Appendix HE-D, Adequate Sites Inventory, p. HE-D-1.

building permit data; and other knowledge and information compiled by City staff in the Planning and Real Estate Assets Departments<sup>15</sup>.

In short, the Adequate Sites Inventory is a suitable dataset for the potential development displacement analysis presented in this memorandum because (1) the data was developed by the City of San Diego and is being used by the City for official planning purposes under state housing laws, and (2) the data is based on a comprehensive geographic analysis of potential housing development and redevelopment sites.

### Calculations

To calculate the development potential on these sites, based on both the 2014 ALUCP and ALUCP Update, the following design elements were applied, based on City zoning requirements and conventional design guidelines:

- average heights of stories
- proportion of the lot covered by the building
- maximum building heights set by zoning (where applicable).

**Table 5** presents the average heights of stories used in estimating the GOA of potential future buildings.

TABLE 5 HEIGHT OF STORIES

COMMUNITY PLANNING AREA, ZONING DISTRICT	HEIGHT OF STORIES (IN FEET)		
	FIRST FLOOR	UPPER FLOORS	ROOFTOP EQUIPMENT/ATTIC <sup>1</sup>
Downtown CPA and Commercial Zones	15 <sup>2</sup>	10 <sup>3</sup>	10
Non-commercial Zones in Uptown, Greater Golden Hill, and Southeastern San Diego CPAs			
Buildings Taller than 50 Feet	10 <sup>3</sup>	10 <sup>3</sup>	10
Buildings Less than 50 Feet	9 <sup>4</sup>	9 <sup>4</sup>	5

NOTES:

- 1 Estimates provided by Ricondo & Associates, Inc. The lower estimates for buildings less than 50 feet are based on Google Street View survey of the Uptown CPA.
- 2 San Diego Municipal Code Section 156.0310(e) (for Downtown CPA) and Section 131.0548 (for commercial zones outside the Downtown CPA).
- 3 Estimates based on information provided at <https://www.measuringknowhow.com/how-high-is-a-story-average-height-measurement-explained/>, accessed September 20, 2024.
- 4 Estimates based on Google Street View survey of Uptown CPA and information provided at <https://www.measuringknowhow.com/how-high-is-a-story-average-height-measurement-explained/>, accessed September 20, 2024.

SOURCE: Ricondo & Associates, Inc., October 2024.

**Table 6** presents the lot coverage requirements in the Downtown CPA established in the Zoning Code.

<sup>15</sup> City of San Diego, *City of San Diego General Plan, Housing Element 2021-2029*, Appendix HE-D, Adequate Sites Inventory, p. HE-D-4.

**TABLE 6 LOT COVERAGE BY BUILDINGS IN DOWNTOWN COMMUNITY PLANNING AREA**

NEIGHBORHOOD	HEIGHT OF BUILDING BASE	LOT COVERAGE UP TO HEIGHT OF BUILDING BASE	LOT COVERAGE, UPPER FLOORS
Little Italy	45 feet	100%	50%
Cortez	85 feet	100%	50%

SOURCE: San Diego Municipal Code, Section 156.0310, Table 156-0310-A.

**Table 7** presents estimates of lot coverage and maximum building heights in the Uptown, Greater Golden Hill, and Southeastern San Diego CPAs. The building heights were estimated by applying the maximum floor area ratios allowed in these areas with the story heights from Table 4. Lot coverage in the residential zoning districts was estimated based on the building setback requirements in the Zoning Code

**TABLE 7 LOT COVERAGE AND MAXIMUM BUILDING HEIGHTS IN UPTOWN, GREATER GOLDEN HILL, AND SOUTHEASTERN SAN DIEGO COMMUNITY PLANNING AREAS**

ZONING DISTRICTS	LOT COVERAGE OF LOWER FLOORS	LOT COVERAGE OF HIGHEST OCCUPIED FLOOR <sup>1</sup>	MAXIMUM BUILDING HEIGHT <sup>2</sup>
CC-2-1, CC-3-4, CC-3-6, CN-1-3 Commercial	100% <sup>3</sup>	50%	85 feet
RM-1-1, RM-1-2, RM-2-5 Residential	62% <sup>4</sup>	20%	120 feet
RM-3-7, RM-3-9 Residential	69% <sup>4</sup>	30%	110 feet
RS-1-1, RS-1-4, RS-1-7 Residential	67% <sup>4</sup>	40%	120 feet

NOTES:

- 1 The lot coverage for the top floors was calculated to ensure that the gross occupancy area of the building would achieve the maximum 6.5 floor area ratio (FAR). Greater coverage proportions for the top floors would exceed the 6.5 FAR limit.
- 2 Calculated based on maximum floor area ratios (FARs) of 6.5 in these CPAs after applying the lot coverage percentages and the average story heights from Table 4. The FARs are taken from *Complete Communities Housing Solutions, Floor Area Ratio (FAR) Allowances*, February 17, 2021 (map).
- 3 San Diego Municipal Code, Section 131.0531(c), Table 131-05E.
- 4 Lot coverage requirements, per se, do not apply in these zones, but building setbacks are required. These estimates are based on the building setback standards in San Diego Municipal Code, Section 131.0431, Table 131-04G.

SOURCE: Ricondo & Associates, Inc., October 2014.

**Exhibit 8** depicts the adequate housing sites on the east side of the Airport where the revised height limits of the ALUCP Update would affect potential new development. Sites that could accommodate more housing development are indicated in orange, sites that would be restricted to less development are in blue, and sites that would be unaffected by the ALUCP Update are in gray.

**Table 8** presents the results of the analysis of potential displacement attributable to the proposed airspace protection height limits. The analysis found that 788 additional units could be built with the ALUCP Update because of the removal of some sites from the height limitation area. In contrast, 1,453 units would be

unable to be built with the ALUCP Update, resulting in a net reduction of 665 units. An estimated 25 of those units were on sites identified by the City as suitable for lower income affordable housing.

**TABLE 8 POTENTIAL DEVELOPMENT DISPLACEMENT ATTRIBUTABLE TO PROPOSED HEIGHT LIMITS**

NATURE OF CHANGE	CHANGE IN POTENTIAL DWELLING UNITS	
	ALL ADEQUATE SITES	ADEQUATE SITES FOR LOWER INCOME HOUSING
Potential Increase in Dwelling Units <sup>1</sup>	788	0
Potential Decrease in Dwelling Units <sup>2</sup>	-1,453	-25
Potential Net Change in Dwelling Units	-665	-25
Change as a Percentage of Adequate Sites in City <sup>3</sup>	-0.38%	-0.06%

NOTES:

- 1 In areas removed from the threshold siting surface and outside the runway end siting surface (RESS) and one engine inoperative (OEI) surfaces.
- 2 In areas beneath the RESS and OEI surfaces.
- 3 The City identified adequate sites with the potential for 174,673 dwelling units, including 44,880 units affordable for lower income households (extremely low, very low, and low income). See *City of San Diego Housing Element 2021-2029*, Appendix HE-D, page HE-D-1.

SOURCE: Ricondo & Associates, Inc., October 2014.

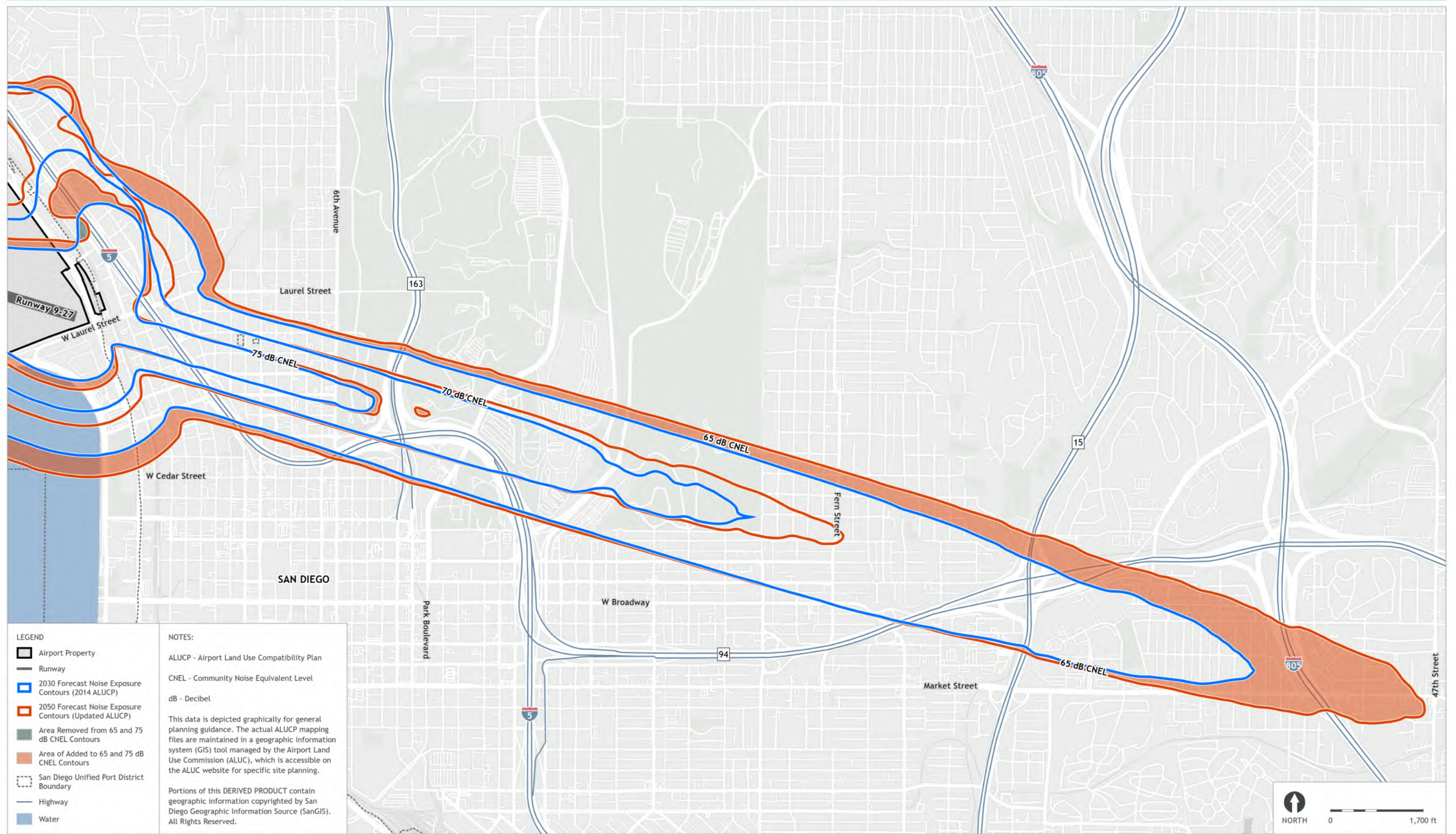
### Scale of Impact – Airspace Policy

The City was assigned a Regional Housing Needs Assessment (RHNA) goal of 108,036 dwelling units for the period ending in 2029. In its updated Housing Element, the City identified sites throughout San Diego that could accommodate a total of 174,673 dwelling units. The net loss in potential dwelling units with the ALUCP Update equates to 0.38 percent of all sites. The potential loss in units affordable for lower income households is 0.06 percent of the 44,880 potential affordable units identified by the City.

ENCLOSURES: EXHIBITS 1 THROUGH 8

cc: 21-14-1229-5.3.1

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- LEGEND**
- Airport Property
  - Runway
  - 2030 Forecast Noise Exposure Contours (2014 ALUCP)
  - 2050 Forecast Noise Exposure Contours (Updated ALUCP)
  - Area Removed from 65 and 75 dB CNEL Contours
  - Area of Added to 65 and 75 dB CNEL Contours
  - San Diego Unified Port District Boundary
  - Highway
  - Water

**NOTES:**

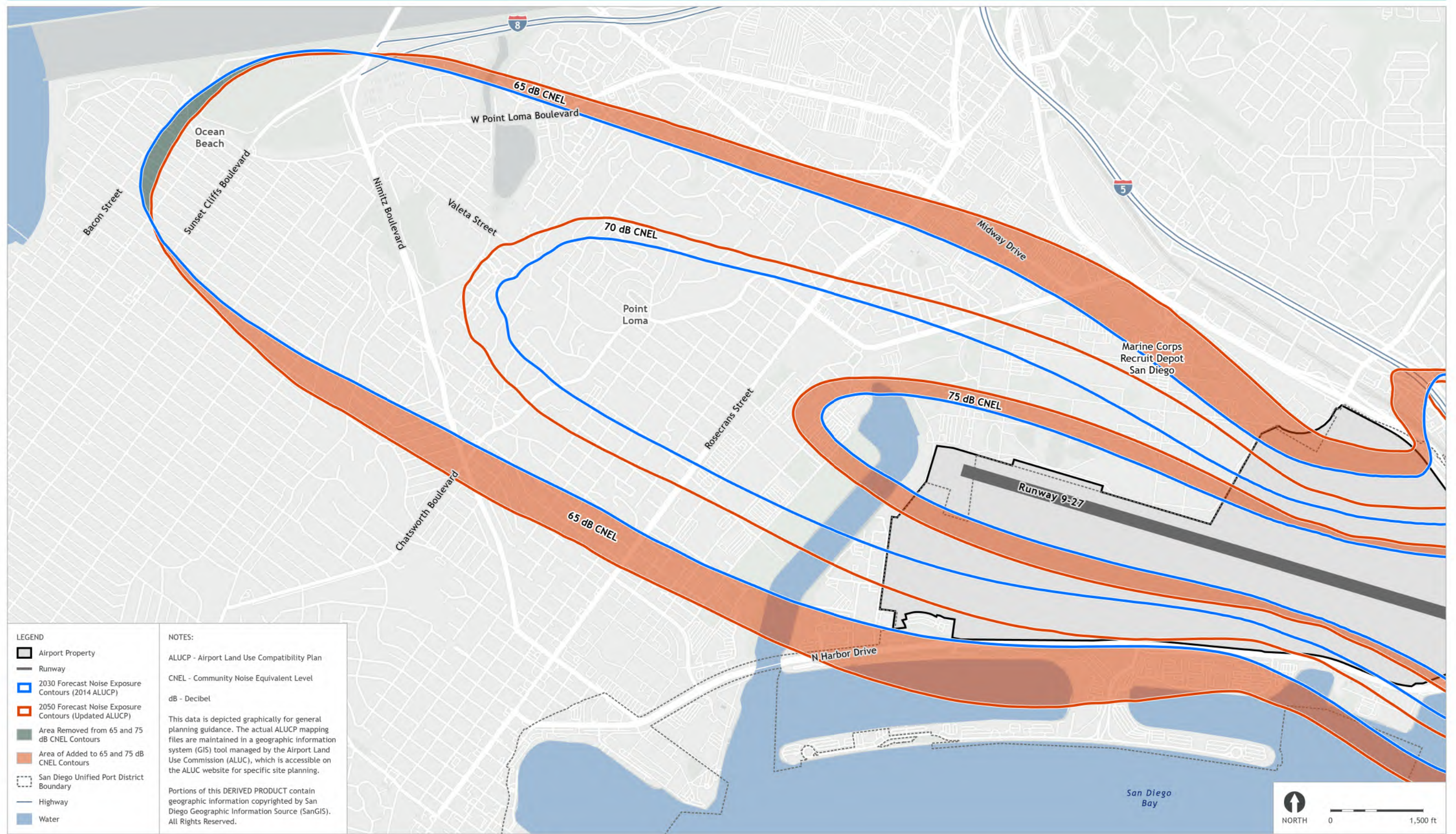
ALUCP - Airport Land Use Compatibility Plan

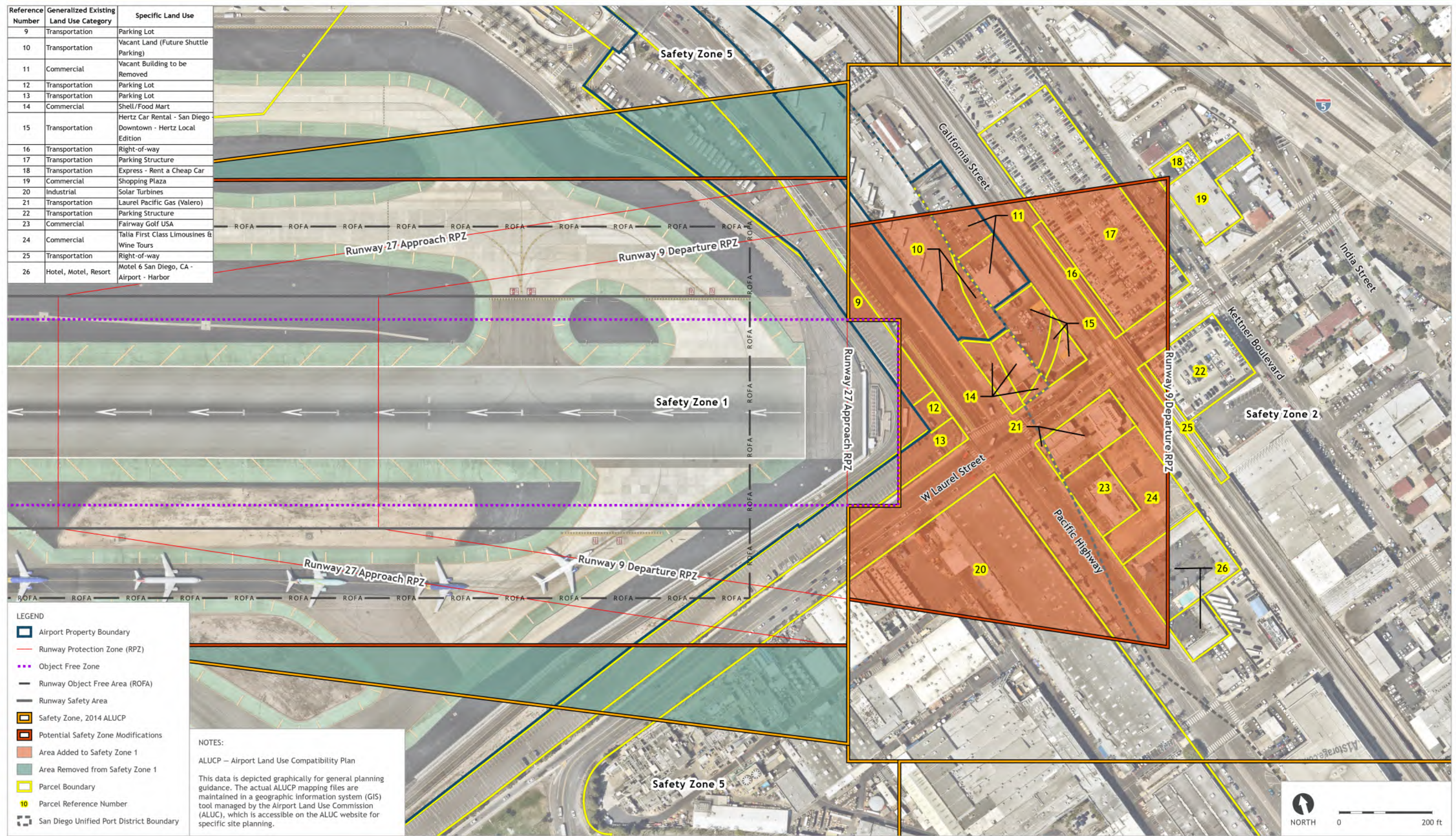
CNEL - Community Noise Equivalent Level

dB - Decibel

This data is depicted graphically for general planning guidance. The actual ALUCP mapping files are maintained in a geographic information system (GIS) tool managed by the Airport Land Use Commission (ALUC), which is accessible on the ALUC website for specific site planning.

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Reference Number	Generalized Existing Land Use Category	Specific Land Use
9	Transportation	Parking Lot
10	Transportation	Vacant Land (Future Shuttle Parking)
11	Commercial	Vacant Building to be Removed
12	Transportation	Parking Lot
13	Transportation	Parking Lot
14	Commercial	Shell/Food Mart
15	Transportation	Hertz Car Rental - San Diego Downtown - Hertz Local Edition
16	Transportation	Right-of-way
17	Transportation	Parking Structure
18	Transportation	Express - Rent a Cheap Car
19	Commercial	Shopping Plaza
20	Industrial	Solar Turbines
21	Transportation	Laurel Pacific Gas (Valero)
22	Transportation	Parking Structure
23	Commercial	Fairway Golf USA
24	Commercial	Talia First Class Limousines & Wine Tours
25	Transportation	Right-of-way
26	Hotel, Motel, Resort	Motel 6 San Diego, CA - Airport - Harbor

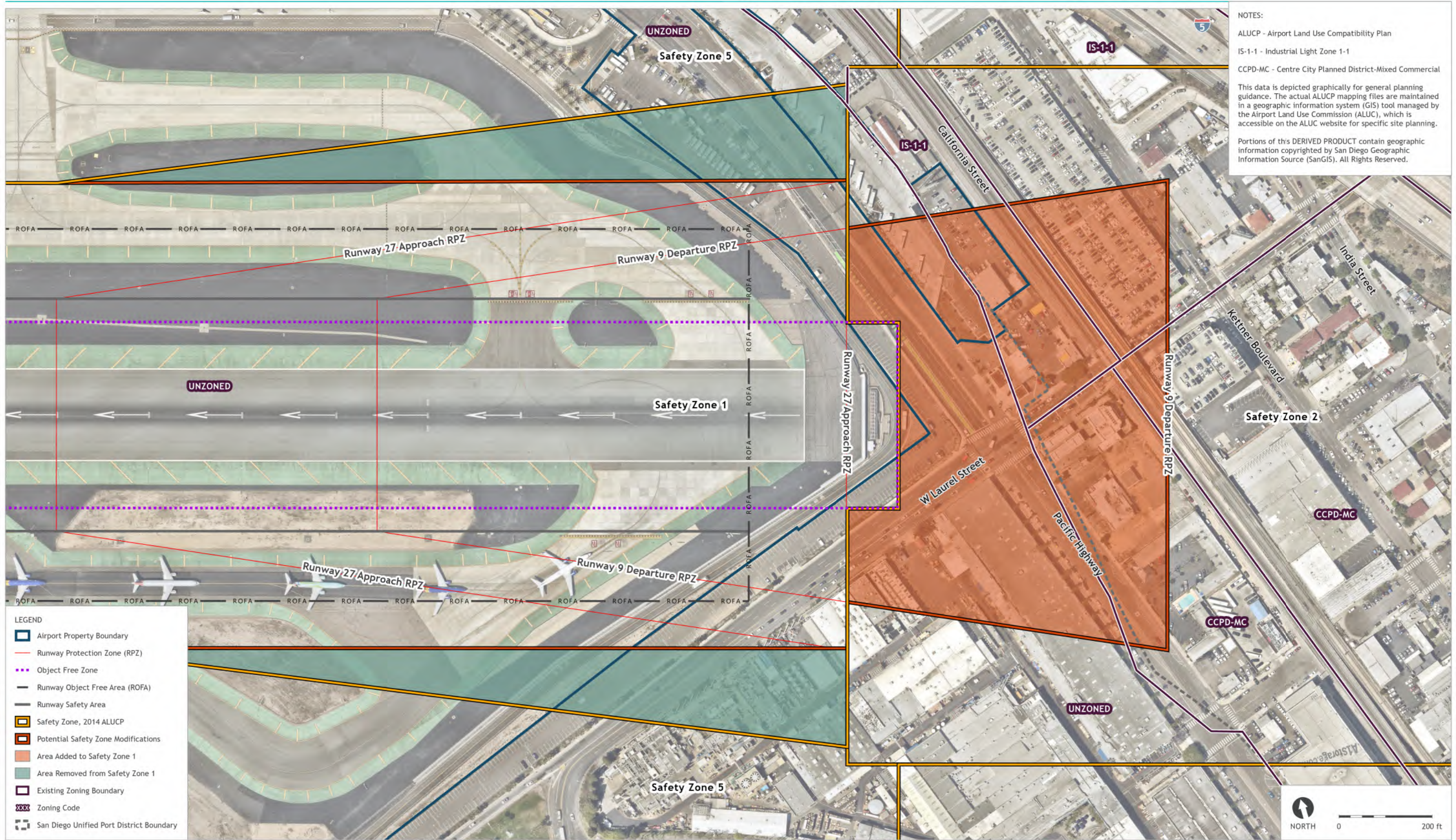
**LEGEND**

- Airport Property Boundary
- Runway Protection Zone (RPZ)
- Object Free Zone
- Runway Object Free Area (ROFA)
- Runway Safety Area
- Safety Zone, 2014 ALUCP
- Potential Safety Zone Modifications
- Area Added to Safety Zone 1
- Area Removed from Safety Zone 1
- Parcel Boundary
- 10 Parcel Reference Number
- San Diego Unified Port District Boundary

**NOTES:**  
 ALUCP – Airport Land Use Compatibility Plan  
 This data is depicted graphically for general planning guidance. The actual ALUCP mapping files are maintained in a geographic information system (GIS) tool managed by the Airport Land Use Commission (ALUC), which is accessible on the ALUC website for specific site planning.







NOTES:  
 ALUCP - Airport Land Use Compatibility Plan  
 IS-1-1 - Industrial Light Zone 1-1  
 CCPD-MC - Centre City Planned District-Mixed Commercial  
 This data is depicted graphically for general planning guidance. The actual ALUCP mapping files are maintained in a geographic information system (GIS) tool managed by the Airport Land Use Commission (ALUC), which is accessible on the ALUC website for specific site planning.  
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Reference Number	Generalized Existing Land Use Category	Specific Land Use
1	Commercial	Offices (LPH Capital, Allen M Gruber and Toni-Diane Donner Mediation and Arbitration)
2	Commercial	Meeting Facility
3	Industrial	Fisherman's Processing
4	Commercial	Moniker Events
5	Transportation	Parking Lot
6	Parks and Open Space	Park Equipment Storage
7	Water	Navy Channel
8	Parks and Open Space	Liberty Station Esplanade



