## Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report

Lead Agency:

Agency Name: San Diego County Regional Airport Authority

Mailing Address: P.O. BOX 82776
San Diego, CA 92138-2776

Physical Address: 3225 N. Harbor Drive
San Diego, CA 92101

Contact: Ted Anasis

The San Diego County Regional Airport Authority (SDCRAA) will be the CEQA Lead Agency and will prepare a Supplemental Environmental Impact Report (SEIR) for the project identified below. We need to know the view of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the SEIR prepared by our agency when considering your permit or other approval for the project.

The SDCRAA is requesting input from interested governmental and quasi-government agencies, other organizations and private citizens regarding the scope and content of environmental information to be included in the SEIR. Public agencies receiving this notice may need to use the SEIR prepared by the SDCRAA when considering their permits or other approvals for the proposed project.

Any public agencies that respond to this Notice of Preparation are requested, at a minimum, to:

1. Described significant environmental issues, reasonable alternatives and mitigation measures that they would like to have addressed in the Draft SEIR.
2. State whether they are a responsible or trustee agency for the project, explain why and note the specific project elements that are subject to their regulatory authority.
3. Provide the name, address and phone number of the person who will serve as their point of contact throughout the environmental review process for this project.

The project description, location and the potential environmental effects are contained in the attached materials. A copy of the Initial Study is attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but **not later than 30 days** after receipt of this notice.

Please send your response to Ted Anasis, AICP, at the mailing address shown above. We will need the name for a contact person in your agency.

Project Title: San Diego International Airport Master Plan - Amendments to the Airport Land Use Plan and Airport Implementation Plan

Project Location: San Diego (City (nearest)) San Diego County (County)

Project Description: See the following description of the proposed project.

Date: May 20, 2010 Signature 

Title: Manager, Airport Planning

Telephone: 619.400.2478

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375

## Project Description

### Project Location

The proposed project is located at San Diego International Airport (SDIA). SDIA is located in the northwest portion of the downtown area within the City of San Diego, and is generally bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, the Marine Corps Recruit Depot to the north, and Pacific Highway and Interstate 5 to the east. **Figure 1** shows the general location of SDIA within the regional context.

The proposed improvements that comprise the project to be addressed in the Supplemental Environmental Impact Report (SEIR) are primarily located within the northern portion of the airport, with the exception of a proposed on-airport access road that would extend along the eastern and southeastern boundary of the airport. The specific nature and location of those improvements are described below in Project Characteristics.

### Project Background

The SDIA Airport Master Plan (AMP) describes numerous improvements planned to occur at the airport, generally delineated within an overall Airport Land Use Plan (**Figure 2**) and more specifically defined within a proposed Airport Implementation Plan (**Figure 3**). At the time when the Draft Environmental Impact Report (DEIR) for the AMP was being prepared, the projects included within the Airport Implementation Plan were those that had an immediate purpose and need and were predominantly under the complete development control of the SDCRAA. As such, information regarding the design and operation characteristics and implementation timing of those projects was determined. The AMP also envisioned other improvements that would be developed by future tenants or in partnership with future tenants; however, the details of those future projects were not available at the time (i.e., needed more input from tenants and key stakeholders). Such projects were included in concept within the Airport Land Use Plan, along with the other improvements planned for the airport, but were not included in the Airport Implementation Plan (i.e., the Airport Land Use Plan provides the overall development framework for all improvements planned at the airport, of which the more detailed improvements defined in the Airport Implementation Plan are a subset). Based on information available at the time, the AMP FEIR addressed potential impacts associated with the Airport Implementation Plan improvements at a project-level of analysis, and the impacts associated with land uses and conceptual improvements in the Airport Land Use Plan at a program-level of analysis. The Final Environmental Impact Report (FEIR) for the AMP was certified in May 2008. Since that time, additional coordination with, and receipt of input from, various airport tenants and key stakeholders has occurred, and further planning of certain conceptual improvements identified in the Airport Land Use Plan has been completed. A revised Airport Land Use Plan has been drafted that would amend the currently adopted AMP Airport Land Use Plan based upon additional design planning and minor refinements to the designated land use areas in the northern portion of the airport. A proposed Airport Implementation Plan – Northside Improvements has been prepared that describes the development projects proposed for the northern portion of the airport based upon the facility requirements derived from the airport forecast and coordination with the airport tenants and stakeholders. The improvements associated with the revised Airport Land Use Plan (**Figure 2**) and the proposed Airport Implementation Plan – Northside Improvements (**Figure 3**) include the following:

- Consolidated Rental Car (CONRAC) Facility
- Air Cargo Warehouse Facilities and Associated Improvements
- Central Receiving/Distribution Center
- Terminal Link Roadway (along the eastern perimeter of the airport connecting the proposed northside facilities to the southside of the airport)
- On-site utilities improvements to serve the proposed development

Descriptions for each of the currently proposed northside development components are provided below.

## Project Characteristics

### CONRAC Facility

As described in the AMP Airport Land Use Plan and related FEIR, a CONRAC facility was planned to be constructed in the airport's northside area consisting of an 11,170 space parking structure with 3.3 million square feet. The structure would include 9,000 rental car ready/return and storage spaces and 2,170 public parking spaces.

However, since adoption of the AMP and completion of the FEIR, further coordination with all of the rental car agencies on their rental car forecasts and facility requirements has resulted in the need for a smaller CONRAC facility. As depicted in **Figure 3**, the current proposal is to construct a 1.9 million square foot facility for rental car ready/return and storage operations with up to 6,500 parking spaces. This is a reduction of approximately 1.4 million square feet from what was originally planned and analyzed in the AMP FEIR. The smaller CONRAC facility is planned in the same location designated in the Airport Land Use Plan for Ground Transportation land uses (Yellow). The smaller CONRAC facility is located along Pacific Highway oriented closest to the Sassafras/Pacific Highway intersection that will serve as the primary access point to the CONRAC.

The smaller CONRAC facility is currently planned to be a four level parking structure (with the fourth level covered) that would measure approximately 52 feet[1] in height. The facility would total approximately 1.9 million square feet of space and encompass a footprint of approximately 27.5 acres. The space would include a 40,200 square foot customer service building integrated into the front of the parking structure. The facility would operate 24 hours per day, seven days per week. Shuttle service to and from the passenger terminals would be provided in common use CONRAC buses that would utilize a new Terminal Link Roadway (see below) for access between the passenger terminals and the CONRAC facility. Customers would be dropped-off and picked-up at the CONRAC customer service building.

The primary ground access to the CONRAC facility would be located near the intersection of Pacific Highway/Sassafras Street. This intersection would be used by customers for returning rental cars as well as exiting the facility. A service access for the CONRAC facility would be via the Pacific Highway/Washington Street intersection and connecting to a new on-site road between the new CONRAC and air cargo facilities. The service access route would be utilized by employees, maintenance vehicles, semi-truck car carriers, fueling vehicles, etc.

In conjunction with the size reduction and advanced implementation of the CONRAC facility, the improvement of the SAN Park Pacific Highway surface parking facility described in the Proposed Airport Implementation Plan would be relocated west of the proposed CONRAC facility. The 2,170 public parking spaces originally envisioned to be included in the CONRAC structure will be located in this new surface parking lot. Access to the new parking lot would be provided via the new on-site road that connects to Sassafras Street and Washington Street.

### Air Cargo Warehouse Facilities and Associated Improvements

As depicted in **Figure 3**, new air cargo facilities would be located parallel to, and on the northside of, Taxiway C. The currently proposed facilities would include 225,000 square feet of warehouse space for air cargo, and an aircraft parking apron with up to nine (9) parking positions for cargo aircraft. All current and future air cargo operators would be consolidated into the new cargo facilities. The proposed cargo warehouse facilities would be designed to accommodate future air cargo volumes at SDIA.

[1] This height distance is measured from the surface of the ground floor to the surface of the top floor (44 feet) plus an estimate of eight additional feet for a planned canopy or hard top. The ultimate height for the structure will be determined during final design.

Due to the existing lack of warehouse space at SDIA, all air cargo operations (including the sorting and staging of pallets/containers) are currently conducted out in the open on former runway/taxiway and apron areas in the northern portion of the airfield. The new facilities would provide an enclosed area (warehouse) within which incoming and outgoing cargo can be sorted and staged prior to being transferred between trucks and aircraft. As currently planned, two air cargo warehouse structures would be approximately 116 feet deep, total approximately 1,939 feet in length, and setback 1,113 feet from the runway to provide airspace clearance for the tails of aircraft parked in front of the warehouse. The height of the structures would range from 10 to 20 feet.

The planned air cargo facilities would include the construction of a new aircraft parking apron area. A taxilane would be constructed adjacent to the cargo ramp and parallel to Taxiway C.

**Central Receiving/Distribution Center**

A 40,000 square foot Central Receiving/Distribution Center (CRDC) would be constructed at the far northwest end of the cargo area (on the northwest side of the control tower). The CRDC would provide a single receipt point of all goods presently delivered to the airport. Distribution of these goods to various locations would be conducted by a single delivery service at scheduled times and would eliminate individual vendors at unscheduled intervals. It is anticipated that the CRDC would operate from 3 a.m. to 5 p.m. seven days a week, with the peak of activity being from 4 a.m. to noon.

Access to the air cargo warehouse facilities would be via the Washington Street/Pacific Highway intersection and an existing on-airport perimeter road to the existing terminals.

**Terminal Link Roadway**

The Terminal Link Roadway, identified as a transit corridor in the AMP FEIR, would be a dedicated non-public on-airport road that connects the northside development area and south terminal area. As depicted in **Figure 3**, the road alignment would run south from the Sassafras Street/Pacific Highway intersection to the eastern end of the runway then turn west and proceed to the intersection of North Harbor Drive and the existing Rental Car Access Road. This alignment would take the roadway through the existing general aviation area, the Runway Safety Area (RSA) for Runway 27, and an employee parking lot on State of California lands operated by the Unified Port District of San Diego and leased to Solar Turbines. Related planning considerations for the Terminal Link Roadway include the following:

- Various alignments through the existing general aviation area were evaluated by the San Diego County Regional Airport Authority (SDCRAA) and the preferred option includes relocation of the fixed based operator (FBO). As shown in the AMP FEIR, the relocation of a future FBO facility for general aviation is included in the Airport Implementation Plan.
- The SDCRAA has determined that it would be feasible to construct the Terminal Link Roadway around the end of Runway 27 (i.e., retain the existing airfield service road that extends around Runway 27, place a new airfield security fence along the outside edge of that roadway and construct the Terminal Link Roadway between the new security fence and the existing airport boundary fence).
- The SDCRAA is currently in the process of coordinating with the Unified Port District of San Diego to identify alternate locations for the employee parking leased to Solar Turbines. It is currently anticipated that relocated parking would be provided within approximately 0.5 mile of the Solar Turbines facility.

The Terminal Link Roadway would be dedicated to SDCRAA vehicles and passenger shuttle buses, and no public vehicles would be permitted to use the roadway. As defined in the Northside Planning study, the 2-lane roadway would provide one twelve-foot wide lane in each direction with six-foot shoulders on each side for an overall right-of-way dimension of 36 feet.

## On-Site Utilities

Development of the new CONRAC facility, air cargo warehouse and CRDC facilities described above would include on-site utilities improvements to provide water, sewer, natural gas, storm drain, power, and communications infrastructure for each of the planned facilities. The main trunk lines, or "backbone system," of the new utilities would generally be located within the new on-site access road proposed to extend west from Sassafras Street at Pacific Highway, with the smaller service lines extending generally north and south from the backbone system. The new utility lines would connect to the existing utility infrastructure located nearby, with the majority of the new connections occurring in the vicinity of Pacific Highway and Sassafras Street. Some utilities such as water lines, natural gas lines, and telecommunication lines would also have connections to existing utilities at both the east side and the west side of the proposed development area. No major improvements to existing off-site utilities are currently anticipated to be necessary for the proposed development.

## Potential Environmental Effects

The AMP FEIR addressed the potential environmental effects associated with a variety of improvements planned to occur at SDIA in the near-term and in the more distant future. As discussed in the attached Initial Study, the majority of potential environmental effects associated with the improvements described above have already been adequately addressed in the AMP FEIR. There are, however, some issue areas that warrant further evaluation in order to fully address the potential environmental effects specific to the proposed improvements. Such evaluation will be completed as a Supplement to the AMP FEIR (i.e., the SEIR), providing only the additional information and analysis necessary to address potential impacts associated with the subject improvements to the extent that they are not otherwise fully addressed in the AMP FEIR. As more fully described in the attached Initial Study, such potential environmental effects to be addressed in the SEIR include the following topic:

- Aesthetics.

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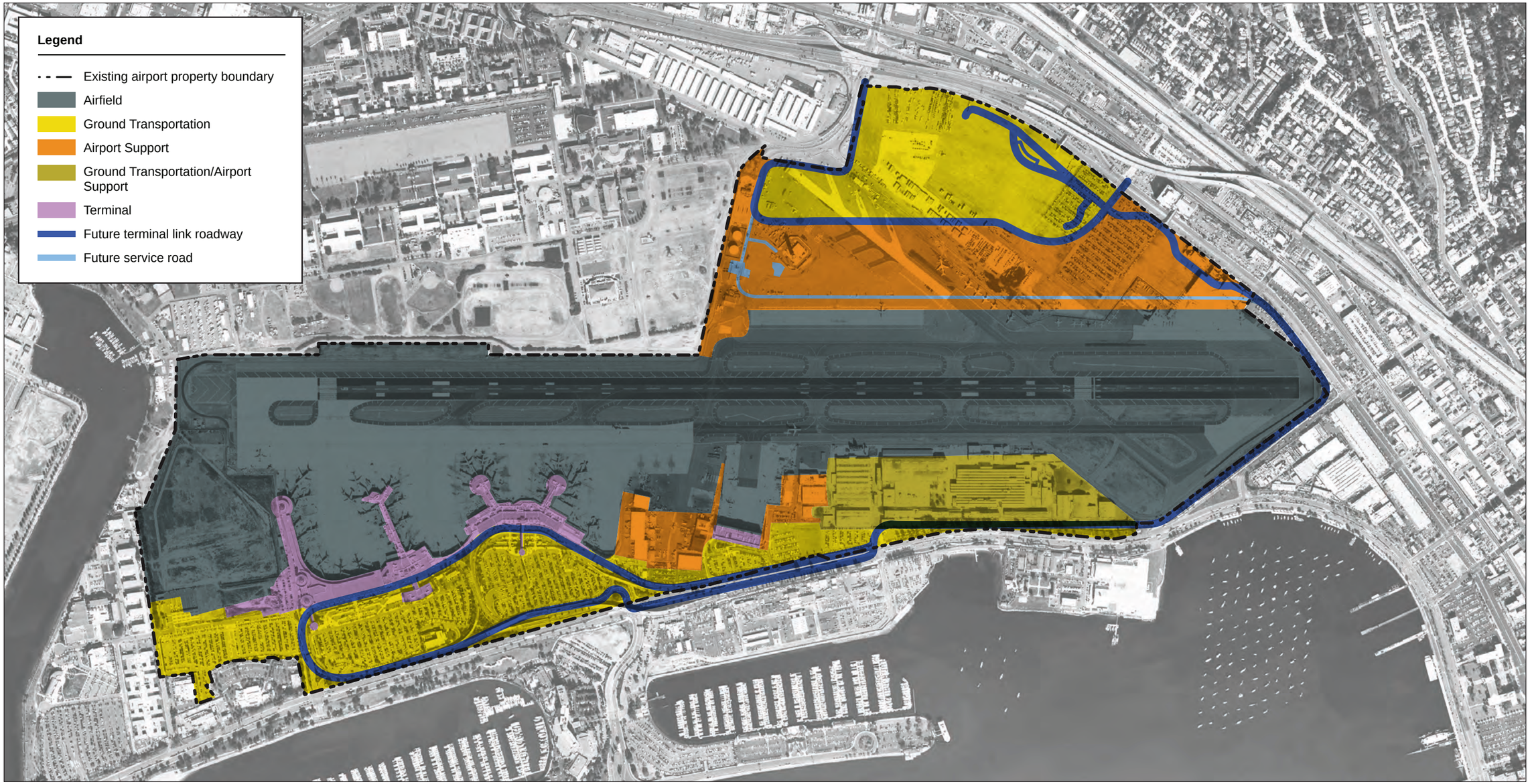
Source: Ricondo & Associates, Inc., May 2009.
Prepared by: Ricondo & Associates, Inc., March 2010.

Figure 1

Not to Scale

north

## Regional Location Map



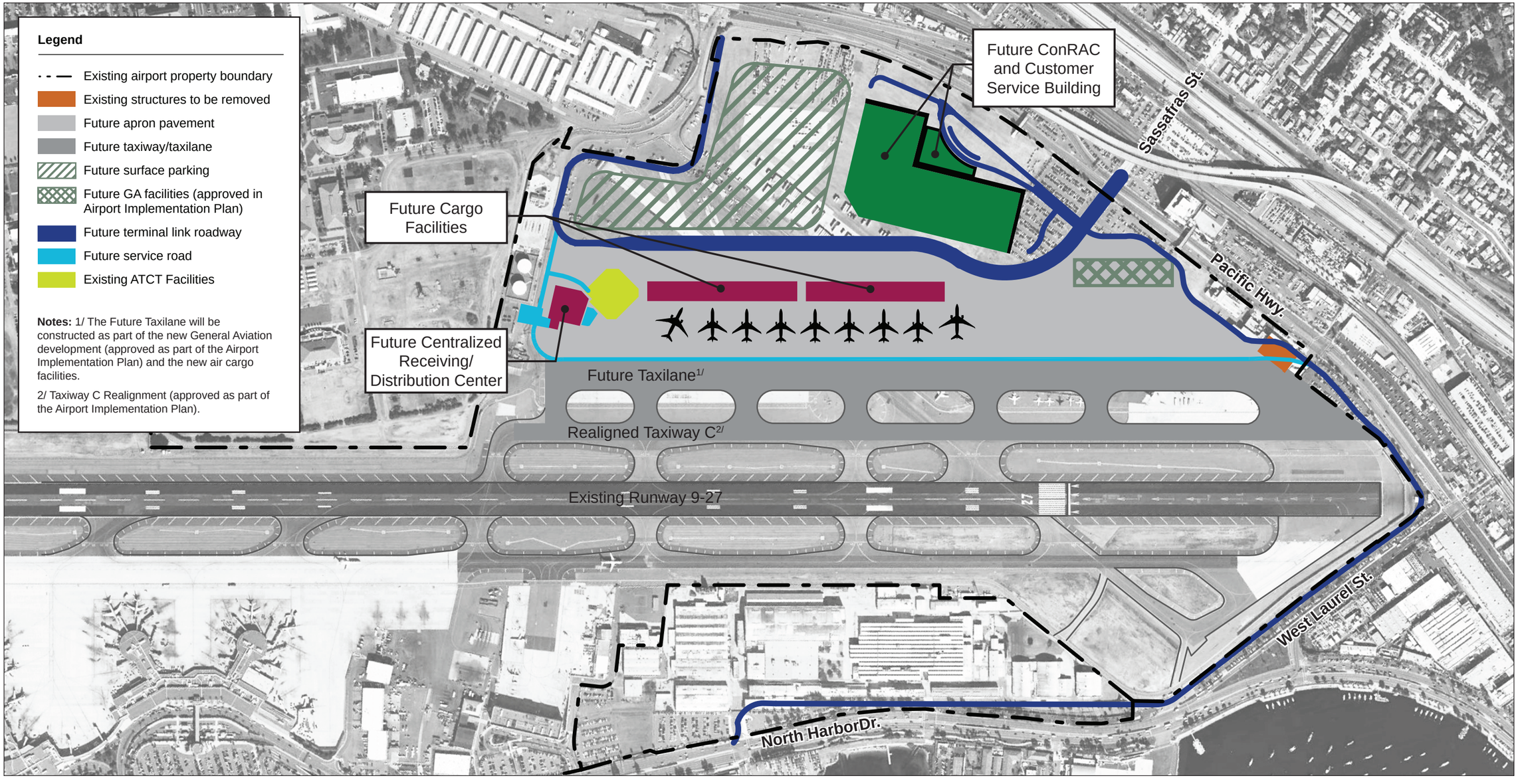

Source: San Diego County Regional Airport Authority, March 2010.
Prepared by: Ricondo & Associates, Inc., March 2010.

Figure 2

Not to Scale.

north

**Revised Airport Land Use Plan**




Source: San Diego County Regional Airport Authority, March 2010.
Prepared by: Ricondo & Associates, Inc., March 2010.

Figure 3

Not to Scale.

north

**Proposed Airport Implementation Plan**
**Northside Improvements**

# Environmental Checklist and Impact Analysis

| | | |
|---|---|---|
| 1 | **Project Title:** | San Diego International Airport Master Plan - Amendments to Airport Land Use Plan and Airport Implementation Plan |
| 2 | **Lead Agency Name and Address:** | San Diego County Regional Airport Authority<br>P.O. Box 82776<br>San Diego, CA 92138-2776 |
| 3 | **Contact Person and Phone Number:** | Ted Anasis, AICP<br>619.400.2478 |
| 4 | **Project Location:** | San Diego International Airport, 3225 N. Harbor Drive, San Diego, CA |
| 5 | **Project Sponsor's Name and Address:** | San Diego County Regional Airport Authority (SDCRAA)<br>P.O. Box 82776<br>San Diego, CA 92138-2776 |
| 6 | **General Plan Designation:** | Institutional & Public and Semi-Public Facilities; Industrial Employment (*per the City of San Diego General Plan; however, the SDCRAA is a local entity of regional government responsible for land use determinations at the airport*) |
| 7 | **Zoning:** | International Airport |
| 8 | **Description of Project:** | The San Diego International Airport (SDIA) Airport Master Plan (AMP) delineates numerous improvements planned to occur at the airport, as generally defined within the long-term development framework of the AMP Airport Land Use Plan. Several of those improvements are more specifically defined for implementation within the Airport Implementation Plan. The AMP Final Environmental Impact Report (FEIR), certified in May 2008, addresses the land uses and improvements contemplated in the Airport Land Use Plan at a program-level of analysis, and the specific improvements of the Airport Implementation Plan at a project-level of analysis, based on information available at the time. Over the past two years, additional planning and coordination with airport tenants and stakeholders has occurred regarding land use areas identified in the Airport Land Use Plan that now enables them to be added to the Airport Implementation Plan. Such improvements are planned primarily in the northern portion of the airport, also referred to as the Northside Development area, and include:<br>• a Consolidated Rental Car (CONRAC) Facility;<br>• Air Cargo Warehouse Facilities and Associated Improvements;<br>• Central Receiving/Distribution Center;<br>• a Terminal Link Roadway along the eastern perimeter of the |

airport connecting the proposed northside facilities to the main terminal area; and

- On-site utility improvements to serve the proposed development.

Please see the accompanying Notice of Preparation for additional information regarding the Project Description. The aforementioned improvements provide the basis for proposed amendments to the adopted AMP Airport Land Use Plan and Airport Implementation Plan, which constitute the Proposed Project for review under the California Environmental Quality Act (CEQA). The analysis provided herein evaluates the degree to which the impacts associated with these improvements have already been addressed in the AMP FEIR and what additional analysis is warranted.

Reference: San Diego International Airport Master Plan and Environmental Impact Report, May 2008. Available at www.san.org.

## Environmental Factors Potentially Affected:

The environmental factors checked below would potentially be affected by this project (i.e., the project would involve at least one impact that is a "Potentially Significant Impact"), as indicated by the checklist on the following pages.

| | | |
|---|---|---|
| [X] Aesthetics | [ ] Agricultural Resources | [ ] Air Quality |
| [ ] Biological Resources | [ ] Cultural Resources | [ ] Geology/Soils |
| [ ] Hazards and Hazardous Materials | [ ] Hydrology/Water Quality | [ ] Land Use/Planning |
| [ ] Mineral Resources | [ ] Noise | [ ] Population/Housing |
| [ ] Public Services | [ ] Recreation | [ ] Transportation/Traffic |
| [ ] Utilities/Service Systems | [X] Mandatory Findings of Significance | |

## Determination:

On the basis of this initial evaluation:

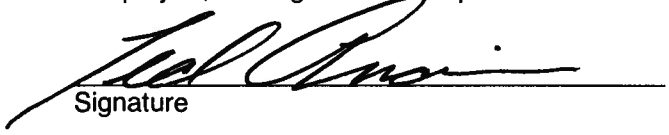
[ ] I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

[ ] I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

[ ] I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.



Signature — May 20, 2010 (Date)

Ted Anasis, AICP (Printed Name) — San Diego County Regional Airport Authority (For)

## Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)

5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [Section 15063(c)(3)(D)]. In this case, a brief discussion should identify the following:

   (a) Earlier Analysis Used. Identify and state where earlier analyses are available for review.

   (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   (c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to the environmental effects of a project in whatever format is selected.

9. The explanation of each issue should identify:

   (a) The significance criteria or threshold, if any, used to evaluate each question

   (b) The mitigation measure identified, if any, to reduce the impact to a less-than-significant level

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **I.** | **AESTHETICS.** Would the project: | | | | |
| a. | Have a substantial adverse effect on a scenic vista? | ✓ | ❑ | ❑ | ❑ |
| b. | Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway? | ❑ | ❑ | ✓ | ❑ |
| c. | Substantially degrade the existing visual character or quality of the site and its surroundings? | ✓ | ❑ | ❑ | ❑ |
| d. | Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area? | ❑ | ❑ | ✓ | ❑ |

## Discussion:

Section 5.13, *Aesthetics,* of the AMP FEIR addresses potential impacts to aesthetic resources from implementation of the AMP. That section cross-references Section 5.12, *Light Emissions,* of the AMP FEIR relative to light and glare impacts. The following evaluates the extent to which those analyses apply to the Proposed Project.

**a. Would the project have a substantial adverse effect on a scenic vista?**

**Potentially Significant Impact.** As described on page 5.13-7 of the AMP FEIR, existing visual resources within the SDIA project area consist of natural and human-made features. Natural visual features include San Diego Bay, the Pacific Ocean and distant views of the Point Loma peninsula. The human-made features include the downtown skyline and various historic structures located on the east side of U.S. MCRD San Diego. The AMP FEIR evaluates potential impacts from 23 key view locations, six of which are located around the northern portion of the airport (i.e., Key Views 12 through 17). The analysis of potential impacts at these view locations includes very general consideration of the types of uses envisioned in the Airport Land Use Plan. The AMP FEIR analysis provides a more detailed discussion of impacts related to improvements proposed under the Airport Implementation Plan. Given that the proposed CONRAC, air cargo improvements envisioned in the Northside Development area now have more project definition and specificity than at the time the AMP FEIR was completed, additional analysis of potential visual impacts associated with those improvements, similar to the analysis provided in the AMP FEIR for the Airport Implementation Plan improvements, can be accomplished to further evaluate the potential for significant visual impacts.. The visual impacts associated with development of the Project elements in the Northside Development area are, for now, considered to be potentially significant. The analysis presented in the AMP FEIR will be supplemented with additional information specific to the improvements currently being proposed.

**b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?**

**Less Than Significant Impact.** The project site is largely vacant or occupied by airport uses, and is devoid of any notable trees, rock outcroppings, or other such scenic resources. The City of San Diego Progress Guide and General Plan Update designates North Harbor Drive and Sports Arena Boulevard in the project area as scenic highways. Views of the project site from these two roadways are dominated by existing airport improvements in the foreground and background, respectively. Implementation of the Proposed Project would not significantly alter the nature and character of those existing views. As such, the conclusion remains that the potential impact would be less than significant and no additional analysis is warranted.

**c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**

**Potentially Significant Impact.** As summarized above, the AMP FEIR provides a general program level of consideration of visual impacts associated with the Airport Land Use Plan, and a more detailed evaluation of impacts associated with improvements under the Airport Implementation Plan. Although the currently proposed improvements were included in concept within the Airport Land Use Plan, the additional project details and specificity now available for those improvements provide a basic for further evaluation of potential visual impacts. The visual impacts are, for now, considered potentially significant and additional information and analysis will be developed to supplement the AMP FEIR.

**d. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?**

**Less Than Significant Impact.** As cross-referenced in Section 5.13 of the AMP FEIR, Section 5.12, *Light Emissions*, addresses potential lighting and glare impacts associated with development at SDIA. The AMP FEIR analysis of impacts associated with new development, such as that associated with the Airport Implementation Plan, indicates light and glare associated with the SDIA project site is presently generated by buildings and exterior sources to protect and secure people, property and the air transportation system. Implementation of the Airport Implementation Plan, as addressed within the AMP FEIR, would increase the size of terminal facilities, aircraft parking, apron, aircraft taxilane, surface and structured parking and vehicle circulation, as well as reconfigure airfield, roadways, and parking facilities. Increased building and exterior sources would result in greater amounts of light emanating from interior and exterior sources. The addition of the currently proposed improvements to the Airport Implementation Plan would materially alter the essence and conclusions of the FEIR analysis. Additionally, inclusion of the following measures from the AMP FEIR as components of the Proposed Project would reduce impacts to a less than significant level.

- The light fixtures specified for the project design must comply with the standard of the Illuminating Engineering Society for full cutoff capability.
- Exterior lighting shall be designed and located as to avoid intrusive effect on runway operations, so as not to result in an air safety hazard. Lighting fixtures shall use shielding, if necessary, to prevent spill lighting on adjacent off-site uses.

Relative to construction-related impacts, page 5.12-3 of the AMP FEIR indicates that construction activities could create light or glare impacts during both daylight and non-daylight hours if safety and security lights were not positioned correctly. With the following measure as a component of the Proposed Project during construction, those impacts would be reduced to a less than significant level.

- During construction activities, the construction contractor shall ensure that temporary construction-related lighting shall be arranged so that direct rays would not shine on or produce glare for adjacent street traffic, or community, biological or scientific resources.

The impacts analysis concludes on page 5.12-4 of the AMP FEIR that, because the AMP project includes improvements (i.e., features and measures incorporated into the project to reduce environmental impacts) to ameliorate the effects of light and glare from additional illumination at SDIA resulting from the Proposed Project and from construction, there would be a less than significant impact due to light emissions.

The AMP FEIR analysis summarized above is fully applicable to the Proposed Project, and adequately addresses potential light and glare impacts. No additional analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **II.** | **AGRICULTURAL RESOURCES.** In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation. Would the project: | | | | |
| a. | Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use? | ❑ | ❑ | ❑ | ✓ |
| b. | Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract? | ❑ | ❑ | ❑ | ✓ |
| c. | Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to nonagricultural use? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.21, *Effects Not Found to be Significant*, of the AMP FEIR, specifically page 5.21-2, provides a discussion regarding agricultural land. The following summarizes the basis for such a conclusion that new development at SDIA would not affect agricultural resources.

**a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?**

**No Impact.** SDIA is underlain by artificial fill and bay deposits, neither of which is identified in the Soil Candidate Listing for prime farmland and farmland of statewide importance by the United States

Department of Agriculture. Further, SDIA is designated as 'Urban Land' and 'Made Land' by the United States Department of Agriculture. Urban Land is land that is primarily covered by buildings, streets, and sidewalks, and, hence, it is unavailable for agricultural activity. Made Land consists of smooth, level areas that have been filled with excavated and transported soil material, paving material, and soil material dredged from lagoons, bays, and harbors, which is also unavailable for agricultural activity. As such, implementation of the Proposed Project would have no impact on farmland. No further analysis is warranted.

**b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** No agricultural resources or operations exist within the project limits or adjacent areas. The project site is not zoned for agricultural use but is designated for airport uses; and no Williamson Act contracts apply to the project site. No further analysis is warranted.

**c. Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to nonagricultural use?**

**No Impact.** No agricultural resources or operations exist within the project limits or adjacent areas. No further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **III.** | **AIR QUALITY.** When available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a. | Conflict with or obstruct implementation of the applicable air quality plan? | ❑ | ❑ | ✓ | ❑ |
| b. | Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ❑ | ❑ | ✓ | ❑ |
| c. | Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | ❑ | ❑ | ✓ | ❑ |
| d. | Expose sensitive receptors to substantial pollutant concentrations? | ❑ | ❑ | ✓ | ❑ |
| e. | Create objectionable odors affecting a substantial number of people? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.5, *Air Quality*, of the AMP FEIR addresses potential impacts to air quality from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project conflict with or obstruct implementation of the applicable air quality plan?**

**Less Than Significant Impact.** As described in greater detail below, the analysis and conclusions of the AMP FEIR relative to air quality impacts related to operational emissions are considered to be applicable to, and adequate for, the improvements included in the Proposed Project. As also described below, implementation of the Proposed Project would add certain improvements to the Airport Implementation Plan; however, the addition of those improvements is not expected to substantially increase the amounts of construction-related emissions addressed in the AMP FEIR. This is due to the fact that implementation of the currently proposed improvements in the northern portion of the airport is anticipated to occur sometime after the peak construction period assumed in the AMP FEIR. As such, no additional analysis regarding potential air quality impacts is warranted.

Operational Emissions: The AMP FEIR includes a delineation of the federal, state, and local regulatory framework applicable to the AMP including the Airport Land Use Plan. The AMP FEIR indicates that implementation of the Airport Land Use Plan, which includes the types of uses included in the Proposed Project, would result in exceedance of the threshold of significance for emission loads of oxides of nitrogen ($NO_x$) in 2030 compared to the No Project Alternative. As indicated in Sections 5.5.6.5 and 5.5.6.6 of the AMP FEIR, implementation of either the Airport Land Use Plan or the No Project Alternative would each exceed the thresholds of significance for concentrations of $NO_2$, Particulate Matter of a size 10 microns or less in diameter (PM10), and Particulate Matter of a size 2.5 microns or less in diameter (PM2.5). All of the exceedances are attributable primarily to emissions from aircraft operations, which for the most part are not within the control of SDCRAA, and from the associated ground service equipment (GSE) operations.

Regarding operational emissions related to the Airport Implementation Plan, as described in Section 5.5.6.1 of the AMP FEIR, the estimated emissions loads and concentrations for 2015 and 2030 are generally comparable to those of the Airport Land Use Plan and the No Project Alternative (i.e., the differences in total emissions and concentration levels between the plans are typically around five percent). Conclusions regarding significant air quality impacts associated with the Airport Implementation Plan are generally comparable to those summarized above for the Airport Land Use Plan, understanding that the improvements within the Airport Implementation Plan are a subset of, and comprise the vast majority of, the land uses and improvements contemplated in the Airport Land Use Plan. The emissions and associated exceedances identified in the AMP FEIR for both the Airport Implementation Plan and the Airport Land Use Plan are driven primarily by aircraft operations and associated GSE.

Implementation of the Proposed Project, which includes certain improvements assumed in AMP FEIR to be in the Airport Land Use Plan but not specifically called out in the AMP FEIR as part of the Airport Implementation Plan, would not change the conclusions of the AMP FEIR air quality analysis. Inclusion of the currently proposed improvements along with the projects specified in the AMP FEIR for the Airport Implementation Plan would not materially change the quantitative and qualitative evaluation of impacts and, moreover, were already accounted for in the AMP FEIR as part of the Airport Land Use Plan. As indicated above, the air pollutant emissions for both the Airport Land Use Plan and the Airport Implementation Plan are driven primarily by aircraft operations and related GSE operations and, both being based on the same aviation activity forecast, are very similar. The relatively minor increases in emissions from the Airport Land Use Plan, compared to the Airport Implementation Plan, appear primarily in the area of motor vehicle emissions. The greater emissions reflect the fact that project-related vehicle emissions associated with the Airport Land Use Plan include those associated with development of the CONRAC, air cargo facilities, and other

transportation improvements not included in the Airport Implementation Plan. If, however, the greater motor vehicle emissions associated with the Airport Land Use Plan were factored into the impacts analysis for the Airport Implementation Plan, the AMP FEIR conclusions would not change. Provided below are Tables 5-5.20 and 5-5.21 from the AMP FEIR delineating the Airport Implementation Plan emissions for 2015 and 2030, as originally stated in the AMP FEIR and as otherwise would occur when using the mobile source emissions from the Airport Land Use Plan (i.e., Airport Land Use Plan include mobile source emissions associated with the CONRAC, air cargo facilities, and access road). The shaded rows in each table present the Airport Land Use Plan on-site and off-site motor vehicle emissions for 2015 and 2030 from Tables 5.5-29 and 5.5-30, respectively, from the AMP FEIR. Also shaded are the rows indicating the airport emissions totals, the differences from the No Project Alternative, and the significance conclusions with the inclusion of mobile source emissions associated with the addition of the CONRAC, air cargo facilities, and other transportation improvements.

**AMP FEIR Table 5-5.20**
**2015 Airport Implementation Plan Alternative**
**Air Emissions Inventory (tons per year)**

| **Source** | **CO** | **VOC** | **$NO_x$** | **$SO_x$** | **PM10** | **PM2.5** |
|---|---|---|---|---|---|---|
| Aircraft | 426 | 133 | 1,004 | 92 | 22 | 22 |
| GSE/APU | 193 | 7.4 | 31 | 2.3 | 1.0 | 0.9 |
| Stationary Sources | 4.1 | 3.5 | 13 | 4.0 | 0.7 | 0.7 |
| Motor Vehicles (On-site) - Original AIP | 35 | 1.6 | 3.7 | 0.0 | 0.8 | 0.6 |
| *Motor Vehicles (On-site) - With Emissions from ALUP* | *47* | *2.3* | *4.9* | *0.1* | *1.1* | *0.8* |
| Motor Vehicles (Off-site) - Original AIP | 141 | 5.4 | 34 | 0.3 | 3.1 | 2.0 |
| *Motor Vehicles (Off-site) - With Emissions from ALUP* | *168* | *6.44* | *41* | *0.3* | *3.7* | *2.3* |
| 2015 Airport Total - Original AIP | 799 | 151 | 1,085 | 98 | 28 | 26 |
| *2015 Airport Total - With Emissions from ALUP* | *825* | *152* | *1,090* | *98* | *28* | *27* |
| 2015 No Project Total | 778 | 150 | 1,082 | 97 | 27 | 26 |
| Differences(+/-) - Original AIP | 21 | 1 | 3 | 1 | 1 | 0 |
| *Differences(+/-) - With Emissions from ALUP* | *47* | *2* | *8* | *1* | *1* | *1* |
| CEQA Thresholds | 100 | 13.7 | 40 | 40 | 15 | 10 |
| Potentially Significant? - Original AIP | No | No | No | No | No | No |
| *Potentially Significant? -With Emissions from ALUP* | *No* | *No* | *No* | *No* | *No* | *No* |

AIP - Airport Implementation Plan
ALUP - Airport Land Use Plan

**AMP FEIR Table 5-5.21**
**2030 Airport Implementation Plan Alternative**
**Air Emissions Inventory (tons per year)**

| Source | CO | VOC | $NO_x$ | $SO_x$ | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| Aircraft | 449 | 163 | 1,461 | 121 | 31 | 31 |
| GSE/APU | 99 | 4.4 | 19 | 2.6 | 0.5 | 0.4 |
| Stationary Sources | 4.1 | 3.7 | 13 | 4.0 | 0.7 | 0.7 |
| Motor Vehicles (On-site) - Original AIP | 21 | 0.9 | 2.0 | 0.0 | 1.0 | 0.8 |
| *Motor Vehicles (On-site) - With Emissions from ALUP* | *29* | *1.3* | *2.7* | *0.1* | *1.4* | *1.1* |
| Motor Vehicles (Off-site) - Original AIP | 91 | 3.8 | 18 | 0.3 | 3.6 | 2.1 |
| *Motor Vehicles (Off-site) - With Emissions from ALUP* | *106* | *4.5* | *22* | *0.4* | *4.2* | *2.5* |
| 2030 Airport Total - Original AIP | 664 | 175 | 1,513 | 128 | 37 | 35 |
| *2030 Airport Total - With Emissions from ALUP* | *687* | *177* | *1,518* | *128* | *38* | *36* |
| 2030 No Project Total | 626 | 172 | 1,456 | 122 | 36 | 34 |
| Differences(+/-) - Original AIP | 38 | 3 | 57 | 6 | 1 | 1 |
| *Differences(+/-) - With Emissions from ALUP* | *61* | *5* | *62* | *6* | *2* | *2* |
| CEQA Thresholds | 100 | 13.7 | 40 | 40 | 15 | 10 |
| Potentially Significant? - Original AIP | No | No | Yes | No | No | No |
| *Potentially Significant? - With Emissions from ALUP* | *No* | *No* | *Yes* | *No* | *No* | *No* |

AIP - Airport Implementation Plan
ALUP - Airport Land Use Plan

As indicated above, the values that incorporate the motor vehicle emissions associated with the Airport Land Use Plan are very similar to, and in some cases the same as, the values originally estimated in the AMP EIR for the Airport Implementation Plan. There is no change in the conclusions regarding the impact significance of the air pollutant emissions.

With regard to air pollutant concentrations, a comparison between the values associated with the Airport Implementation Plan and the Airport Land Use Plan for 2015 and 2030, as presented in Tables 5.5-23, 5.5-24, 5.5-30, and 5.5-31 of the AMP FEIR, shows a similar relationship to that described above relative to emissions - being that there is not much difference between the plans. Again, the main reason is that both emissions and concentrations are driven primarily by aircraft operations and associated GSE operations, and that both plans assume the same future aviation activity level forecast. The relatively minor differences in motor vehicle emissions for the two plans, as summarized above, would not result in major changes in pollutant concentrations if such emissions associated with the Airport Land Use Plan were incorporated into the analysis of the Airport Implementation Plan. There would be no material changes in conclusions regarding the significance of air pollutant concentrations associated with implementation of the Airport Implementation Plan.

The conclusion of the AMP FEIR analysis, presented on page 5.5-41 of the AMP FEIR, indicates that implementation of the proposed AMP project, including the Airport Implementation Plan and the Airport Land Use Plan, would not conflict with or obstruct implementation of an applicable air quality plan; however, significant impacts from project-related $NO_x$ emissions were identified as being

unavoidable. That conclusion would not change with implementation of the Proposed Project (i.e., inclusion of additional improvements in the Airport Implementation Plan that were already included, and accounted for, in the Airport Land Use Plan. No additional analysis of this aspect of air quality impacts is warranted.

Construction Emissions: The AMP FEIR analysis also addresses construction-related emissions associated with the proposed development of improvements anticipated to occur within five years after approval of the AMP. Those improvements included the projects originally assumed within the Airport Implementation Plan, which comprise the vast majority of the projects contemplated in the AMP. The AMP FEIR analysis concludes that construction emissions would be less than applicable thresholds of significance, although emissions of $NO_x$ and Particulate Matter (PM) of a size 10 microns or less in diameter or of a size 2.5 microns or less in diameter (PM10 and PM2.5) would come within 10 percent of significance thresholds. Although the Proposed Project would add certain improvements to the Airport Implementation Plan, construction of those additional improvements is not expected to occur for several years and is likely to be preceded by construction of most, if not all, of the projects originally included in the Airport Implementation Plan. As indicated in Table 5-5.46 of the AMP FEIR, the highest levels of air pollutant emissions are expected to occur within the second, third, and fourth years after approval of the AMP, with a notable drop in construction emissions starting in the fourth year and a major drop in emissions in the fifth. Construction of the currently proposed improvements, such as the CONRAC and the air cargo facilities, is not anticipated to occur until sometime near or after the completion of other major improvements such as those originally included in the Airport Implementation Plan. As such, the AMP FEIR analysis of construction-related emissions is considered to already provide a conservative ("worst-case") estimate of potential air quality impacts; hence, no additional analysis is warranted.

**b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Less Than Significant Impact.** The AMP FEIR analysis indicates that concentrations of ambient air pollutant emissions associated with implementation of the Airport Land Use Plan and Airport Implementation Plan would not exceed National Ambient Air Quality Standards, but would exceed California Ambient Air Quality Standards for $NO_2$ and PM10/PM2.5. As noted above, such exceedances would, however, occur in the future even if the new development did not occur (i.e., would occur even under the No Project Alternative), based on anticipated increases in aircraft operations. Implementation of the proposed AMP Project would, therefore, not result in a violation of air quality standards or contribute substantially to an existing or projected air quality violation (see page 5.5-37 of the AMP FEIR). As indicated above, implementation of the Proposed Project, which calls for amendments to the Airport Land Use Plan and Airport Implementation Plan to accommodate the results of additional project planning would not materially change the air pollutant emissions and concentrations, and the associated significance conclusions, presented in the AMP FEIR. No additional analysis is warranted.

**c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?**

**Less Than Significant Impact.** As indicated in Section 5.5.8 of the AMP FEIR's analysis of cumulative air quality impacts, the estimated amounts of $NO_x$, volatile organic compounds (VOC), and carbon monoxide (CO) emissions from aircraft and GSE associated with SDIA under both Baseline and future year conditions are well within the amounts contained in the current Ozone State Implementation Plan (SIP) and CO Maintenance Plan for San Diego County. Therefore, the emissions associated with planned improvements to SDIA, in combination with all the emissions from

other sources in the area, are fully accounted for and are not expected to impede the area's progress to attaining National Ambient Air Quality Standards and California Ambient Air Quality Standards for these pollutants. As noted above, implementation of the Proposed Project would not materially change the cumulative air quality impacts conclusions of the AMP FEIR analysis. No additional analysis is warranted.

**d. Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact.** As described on page 5.5-11 of the AMP FEIR, sensitive receptors in proximity to the airport include the school and residential areas of Liberty Station to the west and northwest; Spanish Landing Park and the recreation area along Navy Lagoon to the south and west; and the military installations (i.e., Marine Corps Recruit Depot (MCRD) and United States Coast Guard) to the north and southeast. To provide a conservative (worst-case) analysis, other receptors were placed along the SDIA property boundary approximately 1,000 feet apart as a means of the identifying areas of highest pollutant concentrations whether the public had access or not - see Figure 5.5-2 for the locations of the 33 receptors analyzed. The AMP FEIR air quality analysis estimates future concentrations at these receptors assuming buildout of the uses included in the Airport Land Use Plan, with the highest concentrations summarized in Tables 5-5.30 and 5-5.31 for the modeling years 2015 and 2030, respectively. The results indicate exceedances of the California Ambient Air Quality Standards for $NO_2$, PM10 and PM2.5. Such exceedances would also occur under the Airport Implementation Plan and the No Project Alternative, as indicated in Tables 5-5.42 and 5-5.44 of the AMP FEIR. These conclusions and supporting analysis would not be materially changed by the Proposed Project. No additional analysis is warranted.

**e. Would the project create objectionable odors affecting a substantial number of people?**

**No Impact.** Given the basic nature and location of the proposed improvements, including a CONRAC between the airfield and industrial/commercial uses to the north, an on-airport access road between the airfield and adjacent existing roadways, and air cargo warehouse facilities adjacent to the airfield, implementation of the Proposed Project would not create objectionable odors affecting a substantial number of people. No further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **IV.** | **BIOLOGICAL RESOURCES.** Would the project: | | | | |
| a. | Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ❑ | ❑ | ✓ | ❑ |
| b. | Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ❑ | ❑ | ❑ | ✓ |
| c. | Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? | ❑ | ❑ | ❑ | ✓ |
| d. | Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ❑ | ❑ | ❑ | ✓ |
| e. | Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ❑ | ❑ | ❑ | ✓ |
| f. | Conflict with the provisions of an adopted habitat conservation plan; natural communities conservation plan; or other approved local, regional, or state habitat conservation plan? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.8, *Biotic Communities/Endangered and Threatened Species*, of the AMP FEIR addresses potential impacts to biotic resources including listed species, and Section 5.9, *Wetlands*, of the AMP EIR addresses potential impacts to wetland resources from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Proposed Project.

**a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** As indicated on page 5.8-1 of the AMP FEIR, the vast majority of SDIA is developed or highly disturbed and devoid of any sensitive biotic resources. The two notable exceptions are the California least tern nesting areas ("ovals") at the southeast portion of SDIA and the undeveloped portion of the former Naval Training Center at the southwest portion of SDIA. As such, the improvements currently proposed in the northern portion of the airport are not located at, or near, the two sensitive resource areas. The Proposed Project on-airport access road that would connect the northern and southern portions of the airport would pass to the south of, but away from, the California least tern nesting areas. More specifically, the proposed access road would be aligned along the south edge of the airport property, which would place it approximately 75 to 100 feet away from the nearest point of the nesting area. The existing airfield service road located immediately south of and adjacent to the nest area would remain in place, and that service road along with a new segment of airfield security fence would separate the new on-airport access road from the least tern nesting area. Based on the above, potential impacts to the California least tern nesting area are anticipated to be less than significant.

**b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**No Impact.** As indicated on page 5.9-2 of the AMP FEIR, there are currently no wetlands (i.e., riparian habitat) at SDIA.[1] There is no other sensitive natural community at SDIA. As such, no impact to wetlands would occur from the Proposed Project and no further analysis is warranted.

**c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** As noted above, there are no wetlands near the currently proposed improvements; hence, no impact would occur and no further analysis is warranted.

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

**No Impact.** As noted above, the vast majority of SDIA is developed or highly disturbed, with the exception of two areas in the southern portion of the airport (i.e., the California least tern nesting areas ("ovals") at the southeast portion of SDIA and the undeveloped portion of the former Naval Training Center at the southwest portion of SDIA). Those areas do not support any movement of species. No impact would occur from the Proposed Project and no further analysis is warranted.

**e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**No Impact.** As noted above, the vast majority of SDIA is developed or highly disturbed, with the exception of two areas in the southern portion of the airport. Those areas do not support any

[1] Although page 5.9-2 of the AMP FEIR notes the presence of a small disturbed wetlands area within the former NTC parcel, that disturbed wetlands no longer exists.

resources that are subject to local policies or ordinances such as a tree preservation policy or ordinance. No impact would occur from the Proposed Project and no further analysis is warranted.

**f. Would the project conflict with the provisions of an adopted habitat conservation plan; natural communities conservation plan; or any other approved local, regional, or state habitat conservation plan?**

**No Impact.** As indicated on page 5.8-6 of the AMP FEIR, SDIA is not within an adopted habitat management plan or natural communities conservation plan. Although the airport is within the municipal limits of the City of San Diego, and the City is a participating jurisdiction in the San Diego Multiple Species Conservation Program (MSCP), State Tidelands along San Diego Bay are specifically excluded from the MSCP. These State Tidelands are addressed in the San Diego Bay Integrated Natural Resources Management Plan, which was prepared by the U.S. Navy and the Port of San Diego; however, that plan does not focus on "developed fill areas" such as SDIA, nor does it provide applicable guidance for the development of SDIA or the former Teledyne Ryan (TDY) leasehold. As such, no impact would occur and no further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **V.** | **CULTURAL RESOURCES.** Would the project: | | | | |
| a. | Cause a substantial adverse change in the significance of a historical resource as defined in California Environmental Quality Act (CEQA) Section 15064.5? | ❑ | ❑ | ❑ | ✓ |
| b. | Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? | ❑ | ❑ | ❑ | ✓ |
| c. | Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ❑ | ❑ | ❑ | ✓ |
| d. | Disturb any human remains, including those interred outside of formal cemeteries? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.7, *Historic, Architectural, Archaeological, Paleontological, and Cultural Resources*, of the AMP FEIR addresses potential impacts to such resources from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA §15064.5?**

**No Impact.** As delineated in Section 5.7.3.1 of the AMP FEIR, the Allied Aerospace Building is a potential historic resource located in the northern portion of SDIA. The Teledyne-Ryan Complex is an historic district located along the southeastern portion of SDIA. Development of the improvements currently proposed in the northern portion of the airport would not impact the Allied Aerospace

Building. Construction of the new access road between the northern and southern portions of the airport would be away from buildings and would not impact the historic/architectural characteristics of the existing Teledyne-Ryan buildings or the Allied Aerospace Building. No impact is expected to occur and no further analysis is warranted.

**b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA §15064.5?**

**No Impact.** As indicated on page 5.7-10 of the AMP FEIR, no archaeological sites have been identified within the SDIA Master Plan project area. The current topography of the project area has been achieved through decades of dredging and placement of fill soils in an area of bay and mudflats. Based on this, archaeological resources would not be anticipated in the project area. No impact is expected to occur and no further analysis is warranted.

**c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**No Impact.** As indicated on page 5.7-10 of the AMP FEIR, the SDIA Master Plan area is built on what was originally mudflats and bay. Decades of dredging and placement of fill soils have built up the airport area to its current topography. Based on this, there is no potential for paleontological resources within the project area. No impact is anticipated to occur and no further analysis is warranted.

**d. Disturb any human remains, including those interred outside of formal cemeteries?**

**No Impact.** As noted above, the current topography of the project area has been achieved through decades of dredging and placement of fill soils in an area of bay and mudflats. Based on this, human remains would not be anticipated in the project area. No impact is expected to occur and no further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **VI.** | **GEOLOGY AND SOILS.** Would the project: | | | | |
| a. | Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| | i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ❑ | ❑ | ✓ | ❑ |
| | ii. Strong seismic groundshaking? | ❑ | ❑ | ✓ | ❑ |
| | iii. Seismic-related ground failure, including liquefaction? | ❑ | ❑ | ✓ | ❑ |
| | iv. Landslides? | ❑ | ❑ | ❑ | ✓ |
| b. | Result in substantial soil erosion or the loss of topsoil? | ❑ | ❑ | ✓ | ❑ |
| c. | Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | ❑ | ❑ | ✓ | ❑ |
| d. | Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | ❑ | ❑ | ✓ | ❑ |
| e. | Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.14, *Geology and Soils*, of the AMP FEIR addresses potential impacts related to these environmental factors from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

**i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** As indicated on page 5.14-7 of the AMP FEIR, there are no active or potentially active faults known to underlie SDIA and adjacent areas; however, several designated Earthquake Fault Zones occur in close proximity to the south and east, raising the possibility that unknown faults may underlie the project site. The potential for seismically-induced ground rupture is considered less than significant because: (1) the probability of a seismic event of sufficient magnitude to induce surface rupture occurring within the SDIA Airport Land Use Plan area is considered low; (2) project-specific geotechnical investigations required for all development projects would include a fault evaluation study for all proposed structures intended for human occupancy (as previously defined), and would either verify that active faults are not present or that adequate buffers occur, or would identify additional measures to address associated potential impacts (e.g., relocating structures to provide appropriate buffers); and (3) said geotechnical investigations would identify design and construction measures to address potential ground rupture effects for additional proposed facilities such as utilities and pavement, including efforts such as the use of engineered fill (e.g., proper composition and placement methodology), appropriate subgrade design and reinforced concrete, and shorter pipeline lengths with flexible joints. Assuming that the results of the described geotechnical investigation, as well as appropriate elements of regulatory/industry standards such as Uniform Building Code (UBC), Greenbook and/or American Society for Testing and Materials (ASTM) are incorporated into project design and construction, potential impacts related to seismically induced ground rupture would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

**ii. Strong seismic ground shaking?**

**Less Than Significant Impact.** As described on pages 5.14-7 and 5.14-8 of the AMP FEIR, estimated ground acceleration (shaking) levels within and around SDIA could potentially result in significant impacts to proposed facilities such as structures, foundations or utilities, depending on site- and event-specific factors such as event duration, motion frequency and underlying soil/geologic conditions. The project design for new development at SDIA, including the Proposed Project, however, would incorporate measures to accommodate projected seismic loading, pursuant to the recommendations in the required site-specific geotechnical investigation, as well as existing regulatory/industry standards such as the UBC, Greenbook and/or ASTM International. Specific measures from the noted standards (and/or other pertinent sources) that may be used in the project design to accommodate seismic loading include proper fill composition, depth, moisture content and compaction (pursuant to ASTM requirements); use of properly reinforced concrete and masonry; anchoring (or other means for securing applicable structures); and use of appropriate pipeline materials and/or flexible joints. Assuming that the results of the described geotechnical investigation, as well as appropriate elements of regulatory/industry standards are incorporated into project design and construction, potential impacts related to seismically induced ground acceleration would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

**iii. Seismic-related ground failure, including liquefaction?**

**Less Than Significant Impact.** As indicated on page 5.14-8 of the AMP FEIR, SDIA and vicinity are within an area considered to have a generally high potential for liquefaction. The project design for any new development at SDIA, including the Proposed Project, would incorporate measures to address potential liquefaction and related effects, pursuant to recommendations in the required site-specific geotechnical investigation and the previously noted regulatory/industry standards. In the event certain standard measures to remediate liquefaction effects such as ground modification (e.g., dynamic compaction) or the use of deep foundations are determined to be infeasible, additional equally effective measures would be employed as described in the AMP FEIR. Assuming that the results of the required geotechnical investigation, as well as appropriate elements of regulatory/industry standards, are incorporated into project design and construction, potential impacts related to seismically induced liquefaction and related effects would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

**iv. Landslides?**

**No Impact.** As indicated on page 5.14-9 of the AMP FEIR, SDIA and adjacent areas exhibit generally level and low-lying topography, which is not subject to a significant risk from landslides. No impacts would occur and no further analysis of this issue is warranted.

**b. Would the project result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** As indicated on page 5.14-10 of the AMP FEIR, construction activities associated with all new development at SDIA would increase the potential for soil erosion and sedimentation; however, as cross-referenced to Section 5.6, *Hydrology and Water Quality*, of the AMP FEIR, such activities would be subject to National Pollution Discharge Elimination System (NPDES) control requirements, as administered through SDIA Stormwater Management Plans (SWMP). Those measures would serve to reduce erosion and sedimentation impacts to a level that is less than significant. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis of this issue is warranted.

**c. Is the project located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

**Less Than Significant Impact.** See discussions above regarding liquefaction and landslide hazards. Page 5.14-9 of the AMP FEIR addresses other geotechnical issues such as expansive soils, corrosive soils, and compressible materials. The subject analysis concludes that, with implementation of measures recommended in the required project-specific geotechnical investigations, potential impacts would be reduced to a level that is less than significant. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

**d. Is the project located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

**Less Than Significant Impact.** See above.

**e. Would the project have soils that are incapable of supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** SDIA and adjacent areas utilize the City's sanitary sewer system, not septic tanks or other alternative wastewater disposal system. No impact would occur and no further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **VII.** | **HAZARDS AND HAZARDOUS MATERIALS.** Would the project: | | | | |
| a. | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ❑ | ❑ | ✓ | ❑ |
| b. | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ❑ | ❑ | ✓ | ❑ |
| c. | Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school? | ❑ | ❑ | ✓ | ❑ |
| d. | Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ❑ | ❑ | ✓ | ❑ |
| e. | Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area? | ❑ | ❑ | ✓ | ❑ |
| f. | Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area? | ❑ | ❑ | ❑ | ✓ |
| g. | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ❑ | ❑ | ✓ | ❑ |
| h. | Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.15, *Hazards and Hazardous Materials*, of the AMP FEIR addresses potential impacts related to hazardous materials from implementation of the AMP. Section 5.16, *Human Health Risk Assessment*, of the AMP FEIR addresses potential human health risk impacts from implementation of the AMP, including as related to emissions of hazardous air pollutants. The following evaluates the extent to which those analyses apply to the Proposed Project.

**a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less Than Significant Impact.** As indicated on page 5.15-4 of the AMP FEIR, a variety of hazardous materials typically associated with the operation of a commercial airport, including those of airport tenants, are used at SDIA. Such use and activities are strictly regulated by numerous federal, state, and local safety regulations. Because the Airport Land Use Plan, which includes the types of uses proposed for the northern portion of the airport under the Proposed Project, would not involve the generation, use or storage of hazardous materials in quantities or types that are substantially different from those that are currently associated with the airport, the proposed plan would not create additional long-term risks to the public or the environment from these substances. Potential impacts would, therefore, be less than significant and no further analysis is warranted.

**b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Less Than Significant Impact.** As indicated above, a variety of hazardous materials are used at SDIA, and such use is strictly regulated by numerous federal, state, and local safety regulations. The Airport Land Use Plan, which includes the types of uses proposed for the northern portion of the airport under the Proposed Project, would not involve the generation, use or storage of hazardous materials in quantities or types that are substantially different from those that are currently associated with the airport. Development of new facilities at the airport would be subject to current safety management requirements and design standards that serve to minimize, if not avoid, the potential for the occurrence of, and significant hazards from, upset and accident conditions. Potential impacts would, therefore, be less than significant and no further analysis is warranted.

**c. Would the project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school?**

**Less Than Significant Impact.** There is a Montessori School located approximately 0.23 mile east of the Proposed Project area, specifically at 1323 West Spruce Street across from Interstate 5. The proposed uses, which include rental car facilities and cargo facilities, may involve the handling of hazardous materials/wastes; however, such materials/wastes would generally be of a common nature, such as fuels, lubricants, paints, cleansers/solvents, and the like. No acutely hazardous materials, substances, or wastes are anticipated for the proposed uses. As indicated above, the handling of hazardous materials/wastes at the airport is subject to a number of federal, state, and local safety regulations. Based on the nature of the materials/wastes associated with the proposed uses and the existing regulatory framework that applies to the handling of such materials/wastes, potential impacts, if any, to uses in the nearby area would be less than significant. No further analysis of that issue is warranted.

With regard to potential impacts from hazardous emissions, the AMP FEIR includes a human health risk assessment that accounts for hazardous air pollutants (HAPs) from a variety of airport-related

sources including aircraft, GSE, motor vehicles, and stationary sources. Potential impacts are addressed in terms of the receptors (people) at different types of land uses including residences, schools, recreational facilities, and places of employment. Potential health risks are characterized in terms of: (1) cancer incidence (i.e., the probability of an individual contracting cancer from a lifetime [i.e., 70 years] exposure to HAPs in the ambient air); and, (2) non-cancer risks (i.e., eye watering, respiratory or heart ailments, and other non-cancer related diseases) that are either chronic (i.e., produced from a continuous exposure occurring over an extended period of time [weeks, months, years) or acute (i.e., produced within a short period of time [few minutes to several days] following an exposure to HAPs). Table 5-16.2 of the AMP FEIR presents the results of the human health risk assessment relative to receptor types and risk categories. The risk values reported in the table are the "worst-case" conditions based on the highest values found at the numerous receptor locations modeled in the analysis. Table 5.16-2 provides the risk values associated with future operation of the uses contemplated in the Airport Land Use Plan, including the types of uses proposed for the northern portion of the airport under the Proposed Project. The analysis concludes that risk of cancer incidence and the non-cancer chronic (long-term) health risk would be less than significant for all receptor types. The non-cancer acute (short-term) health risk for school areas would be less than significant. The only potential health risks that were found to exceed the recommended threshold of significance were for non-cancer acute health risks at the worst-case receptors for residential, recreational, and off-site worker areas. The risk levels exceeding the recommended thresholds were found to be driven principally by the HAPs acrolein and formaldehyde, which are largely attributable to aircraft, GSE, and motor vehicles.

The improvements and uses associated with the Proposed Project include the same types of uses assumed in the AMP FEIR for the northern portion of the airport, although under the current proposal the amount of development would be less than contemplated in the AMP FEIR analysis (i.e., smaller CONRAC). As such, the AMP FEIR health risk assessment accounts for, if not overestimates, HAP emissions from the Proposed Project improvements. While the AMP FEIR analysis may have overestimated the amount of emissions associated with future development in the northern part of SDIA, those emissions are only a portion of the airport's overall emissions that influence the level of risk in surrounding areas. The predominant source of airport emissions is from aircraft operations, particularly during aircraft takeoffs, landings, and taxiing. The reduction in landside development associated with the current proposal, compared to the AMP FEIR land use assumptions, would not materially affect the aircraft operation assumptions of the AMP FEIR. As such, the resultant reduction in HAP emissions associated with the current proposal would reduce the estimated risk levels to only a very limited extent and would not change the basic conclusions of the AMP FEIR analysis of human health risk impacts.

Implementation of the Proposed Project development improvements would contribute to the airport's overall HAP emissions, which would result in significant impacts related to non-cancer health risks. Section 5.16.7 of the AMP FEIR presents mitigation measures proposed to reduce those impacts. Such measures include: MM5.16-1 for airport terminal design considerations to reduce emissions from GSE and aircraft auxiliary power units; MM5.16-2 for airport tenants to replace diesel-fueled equipment/vehicles with low- and no-emission equipment/vehicles; MM5.16-3 through MM5.16-7 for airside improvements to facilitate more efficient movement of aircraft (reduce engine emissions), roadway system improvements to facilitate more efficient movement of vehicles, and enhancement of the transit plaza; and, MM5.16-8 through MM5.16-12 for reducing emissions from construction activities, such as by using low- and no-emission equipment, encouraging the use of transit and carpooling by workers, and use of grid power rather than from portable generators.

This issue, as related to the Proposed Project, has been adequately addressed in the AMP FEIR and no further analysis is warranted.

**d. Is the project located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Less Than Significant Impact.** As described on page 5.15-5 and shown in Figure 5.15-1 of the AMP FEIR, there are 15 sites and facilities at and near SDIA that are known, or have the potential, to contain hazardous wastes or environmental contamination. Relative to the Proposed Project, this includes five sites and facilities in or near the northern portion of the airport and three sites and facilities in or near the southern portion of the airport. As more fully described on pages 5.15-8 through 5.15-10 of the AMP FEIR, the eight sites/facilities include the following:

| Name | General Location | Description |
|---|---|---|
| **Northern Portion of Airport** | | |
| Airport Fuel Farm - Site No. 6 | North central tip of SDIA | Site of the existing airport fuel farm. Contains two 1 million-gallon aboveground storage tanks for jet fuel. No reported environmental contamination or significant leaks. |
| Former Live-Fire Training Facility - Site No. 7 | North central edge of SDIA, south of Fuel Farm | This 3-acre site was used until 1987 for live-fire training. Now covered with dirt or asphalt, the extent of residual soil/groundwater contamination (if any) is unknown. |
| Former General Dynamics Facility - Site No. 8 | Comprises majority of northeast portion of SDIA | 90-acre site formerly used for manufacturing of aircraft and other military equipment. Presently vacant and serves as a staging area for unloading trucks and parking cars. Chemicals of concern include chlorinated hydrocarbons, petroleum hydrocarbons and chromium. Designated for "open field" land-uses. |
| Jimsair UST - Site No. 9 | East central edge of SDIA | Underground storage tank (UST) associated with an existing Fixed-base operator (FBO). |
| Baron-Blakeslee Facility - Site No. 16 | North of I-5 (Off-Airport) | Chemical use and storage facility listed on state lists for environmental corrective action. |
| **Southern Portion of Airport** | | |
| Former Teledyne-Ryan Facility - Site No. 5 | S.E. sector of airport, N. of Harbor Dr. | Also known as the former Northrop Grumman Corp. and Ryan Aeronautical Company facility, this 47-acre site is presently occupied with vacant buildings and other supporting infrastructure. The environmental condition of the property is currently under litigation. |
| Convair Lagoon - Site No. 11 | S. of airport property, W. of the U.S. Coast Guard facility and S. of Harbor Dr. | 10-acre shallow embayment, site of stormwater conveyance system outfall. Evidence of PCB contamination in sediments reported in 1979. Sampling indicates the former Teledyne-Ryan Facility is the primary source. |
| U.S. Coast Guard Facility - Site No. 12 | S.E. of airport property, and S. of Harbor Dr. | Facility is listed on federal and state lists for hazardous materials and USTs. No reported soil or groundwater contamination or significant spills. |

Figure 5.15-2 of the AMP FEIR shows the location of the development uses proposed for the northern and southern portions of the airport relative to the eight sites/facilities described above. Relative to the northern portion of the airport, Sites No. 8 and No. 9 are located within the area proposed for future development, but Sites No. 6, No. 7, and No. 16 are removed from the development area. Relative to the southern portion of the airport, Site No. 5 is located within the area through which the proposed on-airport access road would extend, but Sites No. 11 and No. 12 are removed from the subject improvement area. As indicated on page 5.15-11 of the AMP FEIR, relative to the fact that such sites/facilities occur at or near the proposed development area, "plans are already in place or under development to avoid or mitigate any potential impacts associated with these sites." Recent environmental assessment of Site No 8 above provides additional information to further define the extent of contamination and to identify the appropriate mitigation measures required by statute and/or regulation ("Phase II Environmental Assessment Report, Former General Dynamics Lindbergh Field Plant Facility, San Diego, California – Kleinfelder, December 2009). In light of the recent studies, the information in, and conclusions of, the AMP FEIR relative to listed sites/facilities and their relationship to future development are considered to still be valid and applicable to the Proposed Project. Potential impacts would be less than significant and no further analysis is warranted.

**e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

**Less Than Significant Impact.** The improvements associated with the Proposed Project would occur within the boundary of SDIA. Development of the proposed uses, which are generally contemplated in the Airport Land Use Plan, is subject to numerous design and operational requirements, particularly those set forth by the FAA, specifically intended and designed to address potential safety hazards. As described on page 5.2-15 of the AMP FEIR, the Airport Land Use Compatibility Plan (ALUCP) for SDIA, which aims to protect public health and safety from noise and other hazards related to the operation of SDIA, indicates that the Airport Land Use Plan would be compatible with the goal of the ALUCP. A similar analysis for the Airport Implementation Plan is provided on page 5.2-19 of the AMP FEIR and finds, for essentially the same reasons as indicated above for the Airport Land Use Plan, the potential impacts would be less than significant. The currently proposed northside development improvements would be consistent with the Airport Land Use Plan and has the same basis for conclusions as the Airport Implementation Plan. As such, potential airport-related safety impacts would be less than significant and no further analysis is warranted.

**f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

**No Impact.** The project is not within the vicinity of a private airstrip. No further analysis is warranted.

**g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** Page 5.15-11 of the AMP FEIR states that there are no potential hazards to public safety or impairment to emergency response or evacuation plans associated with the Airport Land Use Plan, based largely on the fact that the proposed improvements would not involve the generation, use, or storage of hazardous materials in quantities or types that are substantially different from those that currently exist. Page 5.15-13 of the AMP FEIR states that same conclusion for the Airport Implementation Plan for essentially the same reason. The currently proposed northside development improvements include the types of uses proposed in the Airport Land Use Plan. Potential impacts associated with the Proposed Project would be less than significant and no further analysis is warranted.

**h. Would the project expose people or structures to the risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**No Impact.** The project site is within an existing urban industrial environment dominated by concrete and asphalt, well removed from wildlands. There is no fire hazard relative to wildlands. No impact would occur and no further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **VIII.** | **HYDROLOGY AND WATER QUALITY.** Would the project: | | | | |
| a. | Violate any water quality standards or waste discharge requirements? | ❑ | ❑ | ✓ | ❑ |
| b. | Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)? | ❑ | ❑ | ❑ | ✓ |
| c. | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-site or off-site? | ❑ | ❑ | ✓ | ❑ |
| d. | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site? | ❑ | ❑ | ✓ | ❑ |
| e. | Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | ❑ | ❑ | ✓ | ❑ |
| f. | Otherwise substantially degrade water quality? | ❑ | ❑ | ✓ | ❑ |
| g. | Place housing within a 100-year flood plain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | ❑ | ❑ | ❑ | ✓ |
| h. | Place within a 100-year flood plain structures that would impede or redirect flood flows? | ❑ | ❑ | ✓ | ❑ |

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| i. | Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? | ❑ | ❑ | ✓ | ❑ |
| j. | Contribute to inundation by seiche, tsunami, or mudflow? | ❑ | ❑ | ✓ | ❑ |

## Discussion:

Section 5.6, *Hydrology and Water Quality*, of the AMP FEIR addresses potential impacts related to surface hydrology and water quality from implementation of the AMP. Section 5.14, *Geology and Soils*, of the AMP FEIR includes a discussion of groundwater from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Proposed Project.

**a. Would the project violate any water quality standards or waste discharge requirements?**

**Less Than Significant Impact.** As indicated on page 5.6-10 of the AMP FEIR, all future development is subject to the Airport Stormwater Management Plan (SWMP). This would include improvements in the Proposed Project area. The SWMP incorporates the terms of the General Industrial Storm Water Permit which satisfies construction general permit requirements. The SWMP requires that all municipal activities, inclusive of new development, to provide for Best Management Practices (BMPs); therefore, impacts relative to construction, grading, as well as erosion and sedimentation would be less than significant. No further analysis is warranted.

The Airport Land Use Plan, which includes the northside development area, encompasses the former General Dynamics Facility, the Landmark Aviation Fixed Base Operator General Aviation Facilities site, and the TDY complex. While these sites have the potential for existing soil contamination as described in Section 5.15 of the AMP FEIR, any improvements to these areas, including those associated with the Proposed Project, would require additional coordination with review agencies to limit potential for surface, aquifer, and ground water contamination. Such coordination and follow-up would address water quality standards and serve to reduce potential water quality impacts to a level that is less than significant. No further analysis is warranted.

With regard to urban runoff associated with future use of the site, as discussed on page 5.6-10 of the AMP FEIR, the Airport Land Use Plan, which includes the types of uses proposed for the subject northside development improvements, would be implemented by the SDCRAA. Such implementation would include provisions to meet the requirements of the SDIA SWMP, which would result in a less than significant impact on urban runoff. No further analysis is warranted.

**b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?**

**No Impact.** As indicated on page 5.14-5 of the AMP FEIR, shallow, unconfined groundwater has been reported at depths of between 5 and 12 feet below the surface at SDIA. Groundwater levels within SDIA are generally static due to the proximity of the bay and lack of substantive withdrawals

(i.e., through wells and/or pumping), although aquifer levels can vary locally in accordance with mean high tide elevations and diurnal tidal fluctuations. Overall groundwater movement in the site and vicinity is west and south toward San Diego Bay, although this movement may also vary locally.

With the possible exception of temporary construction-related dewatering of shallow groundwater, if required for development of the proposed improvements, approval and implementation of the Proposed Project would not involve withdrawal of groundwater. Development of the Project site could add a very minor amount of new impervious surface area, which would reduce on-site surface water infiltration and groundwater recharge. This impact would be less than significant, given that the vast majority of the site is already, and has long been, paved. No further analysis is warranted.

**c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-site or off-site?**

**Less Than Significant Impact.** There are no streams of rivers at or near the project site. The northside development area is flat and has been subject to previous development, which included the routing of surface flows into the local stormdrain system, as appropriate. Implementation of the Proposed Project may involve some minor rerouting of surface flows, based on the location and orientation of new structures, but is not expected to result in any appreciable change in surface drainage patterns. Potential impacts to surface drainage patterns would be less than significant and no further analysis is warranted.

Regarding the potential for the project to result in substantial erosion or siltation, please see the discussion above in Section VI (b.) of this Initial Study. As indicated, potential impacts would be less than significant. No further analysis is warranted.

**d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site?**

**Less Than Significant Impact.** As indicated above, there are no streams or rivers at the project site, and the vast majority of the site has been previously developed. Implementation of the Proposed Project would not result in a substantial increase in the rate or amount of surface runoff that would result in flooding. Potential impacts to surface drainage volumes would be less than significant and no further analysis is warranted.

**e. Would the project create or contribute runoff water, that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less Than Significant Impact.** See discussions above in Sections VIII (a.), (c.), and (d.). Potential impacts to surface drainage volumes would be less than significant and no further analysis is warranted.

**f. Would the project otherwise substantially degrade water quality?**

**Less Than Significant Impact.** See discussion above in Section VIII (a). Potential impacts to water quality would be less than significant and no further analysis is warranted.

**g. Would the project place housing within a 100-year flood plain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

**No Impact.** The Proposed Project does not entail the construction of housing. No further analysis is warranted.

**h. Would the project place within a 100-year flood plain structures that would impede or redirect flood flows?**

**Less Than Significant Impact.** As indicated on page 5.6-9 of the AMP FEIR, virtually all of SDIA is mapped as Zone X, "areas determined to be outside the 500-year floodplain." Approximately 8.9 acres of the former TDY property is within the mapped 100-year floodplain and could experience up to one foot of flooding during a 100-year storm. As such, none of the development proposed within the northern portion of the airport as part of the proposed improvements would place structures within a 100-year flood plain. Development of the new on-airport access road between the northern and southern portions of the airport would include a segment that passes through the TDY property. This would not, however, represent a structure that impedes or redirects flood flows and no further analysis is warranted.

**i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**Less Than Significant Impact.** There are no levees or dams at or near SDIA that pose a potential for flooding at the project site. Implementation of the improvements contemplated in the Proposed Project would increase the number of people and structures occurring in the northern portion of the airport; however, as indicated directly above, the subject area is not within a 100-year flood plain. Although a portion of the project-related access road would extend through a designated 100-year flood plain at the Teledyne Ryan property, no significant risk or loss, injury, or death would be expected to occur. The SDCRAA would close the road to public access should unsafe flooding conditions be present during or after a major storm. No further analysis is warranted.

**j. Would the project contribute to inundation by seiche, tsunami, or mudflow?**

**Less Than Significant Impact.** SDIA is not near any confined water bodies posing a seiche hazard, nor is it near hillside areas posing a mudflow hazard. As indicated on page 5.6-9 of the AMP FEIR, tsunamis associated with seismic activity are a potential flood hazard; however, the highest recorded tsunami in San Diego Bay was approximately 5 feet from peak to trough, which would not affect SDIA. As such, potential impacts would be less than significant and no further analysis is warranted.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **IX. LAND USE AND PLANNING.** Would the project: | | | | |
| a. Physically divide an established community? | ❑ | ❑ | ❑ | ✓ |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ❑ | ❑ | ✓ | ❑ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| c. Conflict with any applicable habitat conservation plan or natural communities conservation plan? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.2, *Land Use Planning*, of the AMP FEIR addresses potential impacts related to land use plans and land use compatibility from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project physically divide an established community?**

**No Impact.** The currently proposed improvements within the Northside Development area would all occur within the boundaries of the airport and would be comparable to, and compatible with, the other airport-related uses that currently exist. Relative to the Proposed Project, existing off-airport uses adjacent to the northern portion of the airport include the Marine Corps Recruit Depot to the west and northwest and commercial/industrial uses and Interstate 5 to the northeast and east. Existing off-airport uses adjacent to the project-related southern portion of the airport include Harbor Drive and industrial/manufacturing uses to the south. Implementation of the Proposed Project would not physically divide an established community. There would be no impact and no further analysis is warranted.

**b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less Than Significant Impact.** The AMP FEIR analyzed the compatibility of the Airport Land Use Plan, which includes the types of uses associated with the Proposed Project, with numerous land use plans, policies, and regulations. Those plans, policies, and regulations include: the California Tidelands Trust; the California Coastal Act; the SDIA Airport Land Use Compatibility Plan; the San Diego Port Master Plan/California Coastal Act; the City of San Diego Strategic Framework Element; City of San Diego Community Plans including those for the Peninsula, Uptown, Midway-Pacific Highway Corridor, and Downtown Community Plan Areas; North Bay Redevelopment Plan, Naval Training Center (NTC) Redevelopment/Reuse Plan; NTC Precise Plan and Local Coastal Program; San Diego Airport Approach Overlay Zone; and, City of San Diego Airport Environs Overlay Zone (AEOZ). The AMP FEIR evaluation related to each of these land use plans, policies, and regulations found that approval of the then proposed Airport Land Use Plan would not result in any significant conflicts. The AMP FEIR analysis of the land use plan compatibility of the Airport Implementation Plan also concluded that no significant conflicts would occur, in most cases by virtue of the fact that the improvements proposed in the Airport Implementation Plan were consistent with the Airport Land Use Plan. In other cases, the fact that the proposed uses were airport-related and SDIA has long been an airport accounted for in applicable planning documents, and all new development would be subject to airport-related development standards, were the bases for concluding that no significant land use conflicts would occur. That analytical framework and basis for conclusions would also apply to the improvements associated with the Proposed Project. Potential impacts would be less than significant and no further analysis is warranted.

**c. Would the project conflict with any applicable habitat conservation plan or natural communities conservation plan?**

**No Impact.** The project involves development proposed in the northern portion of SDIA, which is in a highly urbanized setting that is largely devoid of biological resources. As discussed above in Section IV (f.), the Proposed Project is not located within any habitat conservation plan or natural communities' conservation plan. There would be no impact related to such a plan and no further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **X.** | **MINERAL RESOURCES.** Would the project: | | | | |
| a. | Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ❑ | ❑ | ❑ | ✓ |
| b. | Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.21, *Effects Not Found to be Significant*, of the AMP FEIR, specifically page 5.21-2, provides a discussion of mineral resources. The following summarizes that discussion, as applicable to the Proposed Project.

**a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** SDIA is underlain by artificial fill and bay deposits and is designated as 'Urban Land' and 'Made Land' by the United States Department of Agriculture. SDIA is not listed as a mineral resource recovery site. As such, SDIA does not contain a known mineral resource of value to the region or residents of California. Implementation of the Proposed Project would have no impact on mineral resources and no further analysis is warranted.

**b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**No Impact.** See above.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **XI.** | **NOISE.** Would the project: | | | | |
| a. | Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies? | ❑ | ❑ | ✓ | ❑ |
| b. | Expose persons to or generate excessive groundborne vibration or groundborne noise levels? | ❑ | ❑ | ✓ | ❑ |
| c. | Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ❑ | ❑ | ✓ | ❑ |
| d. | Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ❑ | ❑ | ✓ | ❑ |
| e. | Be located within an airport land use plan area, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels? | ❑ | ❑ | ✓ | ❑ |
| f. | Be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.1, *Noise*, of the AMP FEIR addresses potential impacts related to noise, including from aircraft, surface traffic (i.e., motor vehicles on nearby roadways), and construction from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?**

**Less Than Significant Impact.** With regard to potential impacts from aircraft noise, the AMP FEIR states: "Aircraft noise analysis is limited to the Proposed Airport Implementation Plan as the land uses within the Proposed Airport Land Use Plan would have a less than significant impact on airfield operations. Specifically, while additional cargo facilities are included with the North Area projects, aircraft operations, including nighttime cargo operations, are not forecasted to increase for a given year due to the Proposed Airport Land Use Plan." (See pages 5.1-6 and 5.1-14 of the AMP FEIR). The currently proposed northside development improvements are consistent with the land use assumptions of the Airport Land Use Plan; hence, the AMP FEIR conclusion that potential aircraft noise impacts would be less than significant is still valid and applicable. No further analysis of this aspect of noise impacts is warranted.

With regard to potential impacts from surface traffic noise, the AMP FEIR analysis includes traffic from the near-term development of uses under the Airport Implementation Plan as well as from the longer term buildout of uses under the Airport Land Use Plan. As indicated on page 5.1-28 of the AMP FEIR, comparison of peak hour $L_{eq}$ noise level increases for AMP buildout with peak hour $L_{eq}$ for the No Project Alternative (i.e., the comparison basis for assessing the potential for significant impacts) indicates a maximum increase of 0.7 dBA, which is less than significant. Relative to impacts measured in terms of Community Noise Equivalent Level (CNEL), the completion of the AMP improvements is assessed as having a less than significant noise impact because it would only incrementally increase daily noise (compared to the No Project Alternative) by 0.7 CNEL. At only one location would the increase compared to the existing condition be in excess of 3.0 dBA $L_{eq}$, and this location is adjacent to an industrial facility (Solar Turbine) and commercial uses. The land uses currently proposed for the northside development area are similar in nature to those assumed in the AMP FEIR for the Airport Land Use Plan; however, the amount of development currently proposed is less than originally assumed. Specifically, the Airport Land Use Plan in the AMP FEIR anticipates the CONRAC to be a 6-story structure with 11,200 vehicle spaces, whereas the Proposed Project reduces that to 4 stories with 4,670 spaces. As such, traffic generation associated with the current proposal would be less than that estimated in the AMP FEIR, and the associated increases in surface traffic noise levels would also be less than calculated in the AMP FEIR. The surface traffic noise impacts associated with implementation of the Northside Development improvements associated with the Proposed Project would, therefore, be less than significant. No further analysis of this aspect of noise impacts is warranted.

With regard to potential impacts from construction noise, Section 5.1.4 of the AMP FEIR provides an estimate of construction noise levels based on a typical mix of construction equipment. This mix of equipment includes pile drivers, which typically have the highest noise levels and the greatest potential to result in noise impacts on nearby noise sensitive uses. As indicated in Table 5-1.16 on page 5.1-31of the AMP FEIR, the maximum noise levels produced by pile drivers would be approximately 69.2 dB at a distance of 1,000 feet from the source. The nearest residence to the Northside Development area is approximately 1,000 feet to the east, across Interstate 5. The threshold of significance for construction noise is 75 dB in residential areas. As such, the maximum noise level estimated for construction activities would not exceed 75 dB in residential areas. It should also be noted that the construction noise would be lower than the aircraft noise and highway noise that occurs in the residential areas near the construction zones. Due to the louder noise levels and more frequent events that occur with aircraft operations and surface vehicle traffic and in consideration of the logarithmic quantities of noise measured in decibels (see Section B.1.1 of Appendix B of the AMP FEIR), aircraft and highway noise would continue to be the determinative sources in the noise environment. Thus, the ambient noise levels would not be expected to increase due to the construction activity. Based on the above, the construction work associated with the improvements contemplated under the Proposed Project would cause less than significant impacts in regard to noise. No further analysis is warranted.

**b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** As indicated on page 5.1-30 of the AMP FEIR, construction work would not be expected to result in excessive ground-borne vibration to home sites. This is considered particularly true for the improvements contemplated under the Proposed Project, given the distant and location of the nearest residence being approximately 1,000 feet and on the other side of Interstate 5 (i.e., would have a greater potential to experience vibration impacts, if any, from heavy truck travel on the nearby freeway than from airport construction activities). Potential vibration impacts associated with project construction would be less than significant. No additional analysis is warranted.

**c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant Impact.** See discussion above in Section XI (a.).

**d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant Impact.** See discussion above in Section XI (b.).

**e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**Less Than Significant Impact.** The improvements contemplated under the Proposed Project are located at SDIA. There would be no people residing at the project site, and potential noise exposure impacts to surrounding areas are discussed in Section XI (a.) above (i.e., less than significant). People working at the project site would be exposed to noise levels typical of an airport. Such noise exposure is regulated by state and federal Occupational Safety and Health Administration (OSHA) standards. Potential impacts would be less than significant and no further analysis is warranted.

**f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The project is not within the vicinity of a private airstrip. No further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **XII.** | **POPULATION AND HOUSING.** Would the project: | | | | |
| a. | Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? | ❑ | ❑ | ✓ | ❑ |
| b. | Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ❑ | ❑ | ❑ | ✓ |
| c. | Displace a substantial number of people, necessitating the construction of replacement housing elsewhere? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.4, *Population and Housing*, of the AMP FEIR addresses potential population and housing impacts from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less Than Significant Impact.** As indicated on page 5.4-3 of the AMP FEIR, implementation of the land use and development plans contemplated under the AMP would not significantly affect population or housing. Developing SDIA with the proposed land uses would not displace any residents or residences because the Proposed Project locations currently contain airport or aviation industrial uses. The planned development also would not generate enough new employment opportunities at SDIA to affect the job/housing balance or induce growth that would affect this balance (see also Section 6.2, *Growth-Inducing Impacts*, of the AMP FEIR). Additionally, the level of improvements proposed at SDIA would not be such to entice new residents to the San Diego area, thereby creating a need for new housing. These conclusions in the AMP FEIR, which apply to the overall land use and development plans for SDIA overall, would also apply to improvements contemplated under the Proposed Project; population and housing impacts would be less than significant and no further analysis is warranted.

**b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** The Proposed Project area is part of an airport. There is no housing on the site. No housing would be displaced by the Proposed Project. No further analysis is warranted.

**c. Would the project displace a substantial number of people, necessitating the construction of replacement housing elsewhere?**

**No Impact.** See above.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **XIII. PUBLIC SERVICES.** Would the project: | | | | |
| a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services: | | | | |
| Fire protection? | ❑ | ❑ | ✓ | ❑ |
| Police protection? | ❑ | ❑ | ✓ | ❑ |
| Schools? | ❑ | ❑ | ❑ | ✓ |
| Parks? | ❑ | ❑ | ❑ | ✓ |
| Other public facilities? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.17, *Public Services*, of the AMP FEIR addresses potential impacts related to fire protection and law enforcement. Section 5.18, *Recreation*, addresses potential impacts related to parks and recreation. Section 5.21, *Effects Not Found to be Significant,* discusses environmental impacts determined during the Notice of Preparation (NOP) process for the AMP DEIR to not be significant, including those related to schools and libraries. The following evaluates the extent to which those analyses apply to the Proposed Project.

**a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

***Fire protection?***

**Less Than Significant Impact.** The AMP FEIR addresses potential impacts to fire protection services relative to required fire flow, response distance and time from existing fire stations and the respective fire department's judgment for needs in the area. As indicated on page 5.17-40 of the AMP FEIR, new development proposed at SDIA is expected to have sufficient fire flow, given the capacity of the water lines serving SDIA. This includes the 12- to 16-inch water mains at SDIA and the secondary system of water laterals branching off of the primary system, which consists of 8- to 16-inch water lines providing service to the terminals and apron areas, as well as the adjacent TDY facilities along Harbor Drive. Of particular note with regard to fire protection is a 10-inch fire service water line surrounding the fuel storage tank farm connected along the north side of the main runway to a 16-inch ductile iron fire service. This 16-inch fire service extends along the access road between MCRD and the former General Dynamics site, where it joins a 12-inch main near the intersection of Washington Street and Pacific Highway.

While additional aircraft movements, passenger activity, and cargo facility development would potentially increase the potential for fires and airfield incidents, standard procedures for plan review would ensure that new construction is developed in conformance with the Uniform Fire Code, the SDF Code, FAA Codes, and other applicable standards. As such, new development would have adequate fire hydrants, fire flow, fire prevention and warning systems, and fire equipment access to all structures and areas of the property.

The San Diego Fire Department's (SDFD's) response time is a function of the type of emergency and the equipment required; for example, it would take more time to get larger equipment to the site than smaller equipment. It is expected that the Airport Station and Stations 1, 3, and 8, with mutual aid from Stations 4, 5, 7, 11, 15, 20 and 22 would continue to provide fire protection services on the airfield and at the airport and maintain adequate response times and service levels. In addition, the SDFD would continue to conduct ongoing reviews of staffing and equipment levels in relation to the proposed development and any changes in aircraft types, increases in aircraft movements and passenger activity. No new fire fighting facilities are expected to be constructed and there would be no need for existing fire stations to be relocated.

The traffic congestion associated with the demolition and construction of major projects within and adjacent to SDIA property would have the potential to hamper or delay emergency response. However, temporary roadway Level of Service (LOS) deficiencies associated with compromised emergency response would be minimized through implementation of a construction traffic management plan, which would be prepared and implemented as appropriate for each project. This would ensure proper advanced coordination with SDFD and planning of detours and emergency access routes to maintain response times.

Based on the above factors, new development at SDIA, including that contemplated in the Airport Land Use Plan such as the types of uses currently proposed for the Northside Development, would result in less than significant impacts on fire protection and emergency medical (i.e., paramedic) services. No additional analysis is warranted.

***Police protection?***

**Less Than Significant Impact.** As described on page 5.17-43 of the AMP FEIR, the San Diego Harbor Police Department (SDHPD) would be expected to incur both short-and long-term impacts related to the construction and operation of new development planned for SDIA. Short-term impacts would include: increase in emergency calls during construction; reports and investigations of construction thefts; and required plan checks and physical inspections; these are addressed below. Long-term (i.e., operational) impacts would include increases in calls for service, business watch and other crime prevention services, as well as increases in case reports. Such new development would not, however, adversely affect the airport substation's protection or operational activities (e.g., through physical impacts to the substation or restrictions in station personnel's access to airport facilities).

Due to the level of security provided at SDIA for civil aviation protection reasons, incidents of theft, destruction or damage at SDIA facilities and to employee vehicles and property are not expected to increase as a result of new development. The proposed development of additional on-airport parking would result in an increase in the number of vehicles parked on-site, which in turn could potentially result in a corresponding increase in vehicle-related incidents (e.g., thefts and break-ins). Overall, however, new development would not result in a significant increase in required law enforcement workload. Furthermore, given the amount of new development anticipated to occur at SDIA and considering that the first response would be from the SDHPD substation at the airport, the new development would not measurably affect Priority 1 response time goals. In addition, the SDHPD would continue to conduct ongoing reviews of staffing and equipment levels in relation to the proposed development and any changes in activities at the airport.

During periods of demolition and construction within and adjacent to SDIA property, construction activities and associated traffic congestion would have the potential to increase response times and increase traffic patrol and other law enforcement activities. These potential impacts would be addressed through coordination and planning with law enforcement and fire protection agencies to reduce effects from construction on traffic, emergency access, and response times. The standard procedures for plan review would also address coordination with local law enforcement agencies to ensure that measures, such as detour plans, scheduling, and traffic control, are implemented where needed to avoid congestion that would hamper emergency response.

Based on the factors discussed above, new development contemplated to occur at SDIA, including that currently proposed for the Northside Development area, would have a less than significant impact on law enforcement. No further analysis is warranted.

***Schools?***

**No Impact.** As indicated in Section 5.21.5 on page 5.21-2 of the AMP FEIR, guidelines from the City of San Diego on significance criteria for schools deal mainly with residential developments that could influence school enrollment. The proposed improvements and future land uses at SDIA do not include any residential development. Additionally, they would not directly impact any schools; that is, all improvements would be physically on existing airport property. No significant noise changes were determined due to the development proposed at SDIA, nor is it growth inducing as detailed in Chapter Six, Other Effects of the Proposed Project, of the AMP FEIR. As such, future development at SDIA, including under the Proposed Project, would not impact school enrollment. No further analysis is warranted.

***Parks?***

**No Impact.** See discussion below in Section XIV (a.).

***Other public facilities?***

**No Impact.** As indicated in Section 5.21.6 on page 5.21-2 of the AMP FEIR, guidelines from the City of San Diego on significance criteria for libraries deal mainly with residential developments that could influence library use. The proposed improvements and future land uses at SDIA do not include any residential development. Also, they are physically on existing airport property and would not include occupation or closure of any libraries. The proposed development at SDIA is not growth inducing as detailed in Chapter Six, *Other Effects of the Proposed Project*, of the AMP FEIR, and therefore, would not impact library use. No further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **XIV.** | **RECREATION.** Would the project: | | | | |
| a. | Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ❑ | ❑ | ✓ | ❑ |
| b. | Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | ❑ | ❑ | ✓ | ❑ |

## Discussion:

Section 5.18, *Recreation*, of the AMP FEIR addresses potential impacts related to parks and recreation from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

**Less Than Significant Impact.** As discussed on page 5.18-3 of the AMP FEIR, new development planned to occur at SDIA, including the type of development proposed for the subject northside development improvements, would not generate increased numbers of visitors to San Diego. Similarly, the employment opportunities created by the expansion of the existing airport facilities would be minor in comparison to the regional labor market and would not be expected to draw new residents to the San Diego area. Accordingly, the new development is not expected to induce new growth within the region that would create an increased demand for parks or other recreational resources.

The development of SDIA in accordance with the Airport Land Use Plan, which would include uses proposed for the northside development area, would not result in any direct impacts to park or recreational facilities. This assessment reflects that the expansion of SDIA would be limited to former aviation industrial Port Tideland leaseholds and a portion of the former NTC that has already been

transferred to SDCRAA. No airport facilities would be expanded into existing or planned recreational areas.

New development would not generate noticeable changes in noise contours off airport. Accordingly, there would be no noise-related effects to the recreational facilities near the airport or under its approach and departure flight paths. Similarly, it is not anticipated that new development would significantly affect viewers at Spanish Landing Park, Harbor Island or other areas where scenic views contribute substantially to the recreational experience.

Based on the above, improvements contemplated under the Proposed Project would have a less than significant impact on recreation. No further analysis is warranted.

**b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

**Less Than Significant Impact.** See above.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **XV.** | **TRANSPORTATION/TRAFFIC.** Would the project: | | | | |
| a. | Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? | ❑ | ❑ | ✓ | ❑ |
| b. | Cause, either individually or cumulatively, exceedance of a level of service standard established by the county congestion management agency for designated roads or highways? | ❑ | ❑ | ✓ | ❑ |
| c. | Result in a change in vessel traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | ❑ | ❑ | ❑ | ✓ |
| d. | Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections), or incompatible uses (e.g., farm equipment)? | ❑ | ❑ | ✓ | ❑ |
| e. | Result in inadequate emergency access? | ❑ | ❑ | ✓ | ❑ |
| f. | Result in inadequate parking capacity? | ❑ | ❑ | ✓ | ❑ |
| g. | Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | ❑ | ❑ | ❑ | ✓ |

## Discussion:

Section 5.3, *Traffic and Circulation*, of the AMP FEIR addresses potential traffic impacts from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

**a. Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?**

**Less Than Significant Impact.** As indicated on page 5.3-4 of the AMP FEIR, the traffic analysis for the AMP FEIR assessed traffic conditions and associated traffic impacts for existing (2005), near-term (2010 and 2015) and mid-/long-term or horizon year (2020, 2025, and 2030) conditions. Impacts are evaluated relative to street segments, intersections, freeway segments and ramps, and railroad crossings. The AMP FEIR analysis of traffic impacts from development under the Airport Implementation Plan, which proposes improvements designed to accommodate airport activity levels projected to occur by 2015, delineates, in the main text of the FEIR, impacts anticipated to occur in 2010, 2015, and 2030. Impacts for 2020 and 2025 are presented in Appendix D of the AMP FEIR. The AMP FEIR analysis of traffic impacts associated with the Airport Land Use Plan is based on a worst-case/conservative assumption that buildout of all land uses envisioned under the Plan occurs by 2015, with the increases in airport-related traffic for the subsequent modeling years (i.e., 2020, 2025, and 2030) being the result of naturally occurring increases in aviation activity forecasted to occur in the future. The AMP FEIR traffic analysis of the Airport Land Use Plan delineates, in the main text of the FEIR, impacts anticipated to occur in 2015 and 2030. Impacts for 2020 and 2025 are presented in Appendix D of the AMP FEIR.

Both the analysis of the Airport Implementation Plan and the analysis of the Airport Land Use Plan assume future increases in traffic generation after completion of the proposed improvements/land uses would occur in conjunction with the forecasted increases in activity levels at SDIA through 2030. Although the AMP FEIR traffic analysis for each plan addresses the same milestone years and utilizes the same airport activity forecast, the analysis of each plan differs in the fact that the traffic generation of the Airport Land Use Plan assumes the development of all AMP land uses by 2015 while the traffic generation for the Airport Implementation Plan does not include certain improvements such as the CONRAC and air cargo facilities planned for the northern portion of the airport and the airport support uses planned for the TDY site in the southern portion of the airport.

In comparing the traffic analyses completed for the two plans, it can be concluded that the analysis of the Airport Land Use Plan is the more conservative (worst-case) of the two, based on the comparatively greater amount of development assumed under that plan. Given that the land uses included in the Proposed Project relative to the Northside Development area are generally consistent with, if not slightly less (i.e., smaller CONRAC) than, the uses assumed in the Airport Land Use Plan, it can be reasonably concluded that the long-term traffic impacts associated with the Proposed Project have been accounted for in the AMP FEIR. Although the AMP FEIR traffic analysis for the Airport Implementation Plan includes an evaluation of traffic impacts in 2010, an analysis year that was not included in Airport Land Use Plan impacts evaluation, the currently proposed addition of the CONRAC and air cargo facilities to the Airport Implementation Plan would not result in impacts that weren't previously disclosed in the FEIR. Development of the CONRAC and air cargo facilities is not expected to occur until after completion of the improvements assumed in the AMP FEIR for 2010 modeling year. Had the CONRAC and air cargo facilities been included in the Airport Implementation Plan as originally assumed and addressed in the AMP FEIR, the traffic associated with those improvements would have been included in the 2015, or later, modeling year. Since the AMP FEIR analysis of the Airport Land Use Plan includes a conservative (worse-case) assumption that all

proposed uses, including the CONRAC and air cargo facilities, would be developed by 2015, the potential impacts of those improvements have already been evaluated and disclosed in the AMP FEIR. No further analysis is warranted.

**b. Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

**Less Than Significant Impact.** As indicated on page 5.3-23 of the AMP FEIR, San Diego Association of Governments (SANDAG) is the designated Congestion Management Agency for the San Diego Region. Congestion Management Plan (CMP) arterials designated by SANDAG are part of the overall CMP system, which includes those roadways that serve the highest level of regional traffic, serve major regional facilities, and provide significant inter-community traffic service and freeway congestion relief. Street segments in the study area designated as CMP Arterials include: North Harbor Drive; Grape Street; Hawthorn Street; and Pacific Highway. As described above, the traffic impacts associated with implementation of the improvements contemplated in the Proposed Project have already been addressed and disclosed in the AMP FEIR's analysis of the Airport Land Use Plan, which assumes all new development is completed by 2015. In light of that, the traffic impacts associated with the Proposed Project have been adequately addressed and no further analysis of this issue is warranted.

**c. Would the project result in a change in vessel traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**No Impact.** The improvements proposed at SDIA, including those associated with the Proposed Project, would all occur on land and would not affect any vessel traffic patterns. No impact would occur and no further analysis is warranted.

**d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less Than Significant Impact.** Implementation of the Proposed Project would include construction of a new on-airport access road between the northern and southern portions of the airport, as well as completion of the east-west access road proposed across the northern portion of the Airport. The subject roads would be designed and constructed in accordance with applicable City of San Diego roadway standards, which provide for safe operation. As such, potential impacts would be less than significant and no further analysis is warranted.

**e. Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** Implementation of the Proposed Project would include construction of new facilities. As indicated on page 5.17-44 of the AMP FEIR, development plans would be reviewed by the San Diego Harbor Police Department (SDHPD) and City of San Diego Fire-Rescue Department (SDFD), and other agencies to help ensure compliance with all applicable codes, ordinances, policies, and standards. Such review would include verification that adequate emergency access is provided and maintained. As such, potential impacts related to emergency access would be less than significant. No further analysis is warranted.

**f. Would the project result in inadequate parking capacity?**

**Less Than Significant Impact.** As indicated on page 5.3-65 of the AMP FEIR, the CONRAC proposed in the northern portion of the airport would, under the original concept, be developed with 9,000 ready, return, and storage spaces to accommodate rental car demand through 2015. The 2,170 parking spaces at the SAN Park Pacific Highway provided in the Airport Implementation Plan (i.e., northward relocation of the existing 1,670-space SAN Park Pacific Highway parking facility plus the addition of 500 new spaces) would also be accommodated in this structure (i.e., total of 11,170 parking spaces within the CONRAC structure). However, as rental car demand grows past 2015

requirements it was anticipated that rental car functions will begin to replace public parking functions in the north area structure. By 2030, it was assumed that all 2,170 public parking spaces in the North Area would be converted to rental car use. This phase-out of the North Area public parking would be offset by the new 3,000 parking spaces at the TDY site, which is assumed to capture the public parking demand previously accommodated in the SAN Park Pacific Highway facility. Under the Proposed Project, the CONRAC would be developed with up to 6,500 parking spaces, which is considered sufficient for the rental car needs at the airport. In conjunction with the size reduction and advanced implementation of the CONRAC facility, the improvement of the SAN Park Pacific Highway surface parking facility described in the Airport Implementation Plan would be relocated west of the proposed CONRAC facility. The 2,170 public parking spaces originally envisioned to be included in the CONRAC structure would be located in this new surface parking lot. Access to the new parking lot would be provided via the new on-site road that connects to Sassafras Street and Washington Street. Page 5.3-81 of the AMP FEIR indicates that implementation of the Airport Land Use Plan would not remove any parking lots designated for public use. Such would still be the case under the current proposal; hence, the conclusion of the AMP FEIR relative to parking impacts is still valid and no further analysis is warranted.

**g. Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

**No Impact.** The Proposed Project would not conflict with policies or potential opportunities supporting alternative transportation. No barriers to pedestrian or bicycle circulation are anticipated. No further analysis is warranted.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **XVI.** | **UTILITIES AND SERVICE SYSTEMS.** Would the project: | | | | |
| a. | Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ❑ | ❑ | ❑ | ✓ |
| b. | Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ❑ | ❑ | ❑ | ✓ |
| c. | Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ❑ | ❑ | ✓ | ❑ |
| d. | Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | ❑ | ❑ | ✓ | ❑ |

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| e. | Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the projected demand of the project in addition to the provider's existing commitments? | ❑ | ❑ | ✓ | ❑ |
| f. | Be served by a landfill with sufficient permitted capacity to accommodate the solid waste disposal needs of the project? | ❑ | ❑ | ✓ | ❑ |
| g. | Comply with federal, state, and local statutes and regulations related to solid waste? | ❑ | ❑ | ✓ | ❑ |

## Discussion:

Section 5.11, *Utilities and Service Systems*, of the AMP FEIR addresses potential impacts related to energy (electricity and natural gas), telecommunication systems, water demand/supply and systems, sewer, and solid waste from implementation of the AMP. The following evaluates the extent to which the analyses pertaining to the questions posed below apply to the Proposed Project.

**a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**No Impact.** As indicated below in Section XVI (b.), implementation of the Proposed Project would result in a less than significant increase in wastewater volumes generated at the airport, which would be subject to payment of applicable sewer capacity fees. Based on the nature of the currently proposed improvements, implementation of the Proposed Project would have no effect on the wastewater treatment requirements set forth by the state Regional Water Quality Control Board-San Diego Region for the City of San Diego. No further analysis is warranted.

**b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**No Impact.** As indicated below in Sections XVI (d.) and (e.), implementation of the Airport Land Use Plan, which includes the currently proposed uses, would not have a significant impact on existing water or wastewater systems. The Project would not require or result in the construction of new water or wastewater treatment plants or expansion of existing facilities. No further analysis is warranted.

**c. Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** As indicated above in Section VIII (e.), the Project's potential impacts to surface drainage volumes would be less than significant and no further analysis is warranted.

**d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Less Than Significant Impact.** A Water Supply Assessment by the City of San Diego Water Department specifically found that adequate water supply would be available for development proposed at SDIA - see page 5.11-11 of the AMP FEIR. This includes the uses assumed for the Airport Land Use Plan, which includes the uses in the Proposed Project. In terms of the water delivery or conveyance system, the land uses for each project component would result in an increased demand for water, which would require an extension of water conveyance facilities on SDIA. Within the northern portion of the airport, development of uses contemplated under the Proposed Project would require extension of water utilities from Pacific Highway. Such utility extensions are typical for most new development projects. As such, the Project's potential impacts related to water supply and water systems are assessed as less than significant. No further analysis is warranted.

**e. Has the wastewater treatment provider, which serves or may serve the project, determined that it has adequate capacity to serve the projected demand of the project in addition to the provider's existing commitments?**

**Less Than Significant Impact.** Development of SDIA in accordance with the proposed Airport Land Use Plan, which includes the types of land uses contemplated under the Proposed Project, would result in additional wastewater-generating facilities (e.g., sinks, toilets). The development of the northern portion of the airport and/or the reuse of the former TDY property could generate new uses at SDIA with an associated (but unquantified) increase in wastewater generation. As discussed on page 5.11-12 of the AMP FEIR, this increase in wastewater generation would not, however, be significant because of the wastewater treatment capacity available to SDIA and because of the airport's location near large San Diego Metropolitan Wastewater Department (SDMWWD) wastewater collection pipelines and Pump Station No. 2. As a result, little-to-no off airport infrastructure would be required to convey increased wastewater flows from SDIA to the SDMWWD sewer system and the Point Loma Wastewater Treatment Plant. Capacity impacts to SDMWWD wastewater treatment facilities would be offset through payment of applicable sewer capacity fees, to the extent required by law. Potential sewer system impacts related to implementation of the Proposed Project, being accounted for within the Airport Land Use Plan, would be less than significant. No further analysis is warranted.

**f. Is the project served by a landfill with sufficient permitted capacity to accommodate the solid waste disposal needs of the project?**

**Less Than Significant Impact.** Operation of the new development proposed at SDIA is anticipated to result in an increase of solid waste generated at SDIA. This increase would be negligible in comparison to the available disposal capacity described on pages 5.11-7 and 5.11-8 of the AMP FEIR. Construction and demolition activities would result in a substantial temporary increase of solid waste generation at SDIA. However, recycling, salvage, reuse, and disposal options would be identified in a Solid Waste Management Plan in advance of all activities in order to minimize the amount of debris directed to local landfills. This plan would include the identification of locations for sorting of materials for reuse and recycling. At least 50 percent of all waste generated during construction and demolition activities would be recycled in accordance with the City of San Diego's Construction and Demolition Debris Diversion Ordinance. As indicated on page 5.11-13 of the AMP FEIR, future development proposed at SDIA would have a less than significant impact on the solid waste disposal system. No further analysis is warranted.

**g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** The disposal of municipal (non-hazardous) waste would occur at Miramar Landfill in accordance with applicable state and local requirements (there are no applicable federal requirements - see Section 5.11.2.3 of the AMP FEIR for discussion of the regulatory framework related to solid waste generation/disposal). Any hazardous waste resulting from construction, demolition, and operations at SDIA would not be disposed at Miramar Landfill and would instead be disposed at a landfill approved to receive hazardous waste, as required by local and state regulations, or otherwise treated/managed in accordance with federal, state, and local requirements (see Section 5.15.2 of the AMP FEIR for discussion of the regulatory framework applicable to hazardous wastes). The project's potential impacts related to the regulation of solid waste would be less than significant. No further analysis is required.

| | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **XVII.** | **MANDATORY FINDINGS OF SIGNIFICANCE.** | | | | |
| a. | Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | ❑ | ❑ | ✓ | ❑ |
| b. | Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ❑ | ❑ | ✓ | ❑ |
| c. | Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ✓ | ❑ | ❑ | ❑ |

**a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

**Less Than Significant Impact.** As described above in Section IV, the Proposed Project would occur at SDIA, which is highly developed and largely devoid of biological resources. The one notable exception is, however, the presence of two nesting areas for the California least tern, which is a federal and state listed endangered species. A portion of the on-airport access road currently proposed between the northern and southern portions of the airport would come in close proximity to the nesting areas. As such, construction activities associated with the proposed access road pose the potential to significantly impact a listed species. This issue warrants further analysis.

**b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

**Less Than Significant Impact.** Table 5-20.6 of the AMP FEIR summarizes the conclusion of the cumulative impacts analysis completed for each environmental topic addressed in the AMP FEIR, as follows:

**Summary of Cumulative Impacts by Topic**

| Topic | AMP FEIR Section | Incremental contribution to significant cumulative impact? |
|---|---|---|
| Noise | 5.1 | The SDCRAA is not currently aware of any proposed projects that would create cumulative noise impacts in combination with aircraft and highway noise exposure levels. |
| Land Use Planning | 5.2 | Cumulative developments envisioned would be consistent with the land uses defined in the area's Community Plans or in the Port Master Plan. Consequently, these future developments when combined with the AMP Project would not result in any significant land use impacts. |
| Traffic and Circulation | 5.3 | Since SANDAG forecasts account for all approved plans and projects within the region, all traffic estimates used in the study account for cumulative traffic. Therefore, traffic impacts represent cumulative impacts anticipated in the study area under each alternative. |
| Population and Housing | 5.4 | AMP Project would not incrementally contribute to a significant cumulative population and housing impact because it would not require relocation of residents, demolish or relocate residences or measurably affect jobs/housing balance. |
| Air Quality | 5.5 | Conservatively high background concentrations levels were modeled to account for air emission sources outside |

**Summary of Cumulative Impacts by Topic**

| Topic | AMP FEIR Section | Incremental contribution to significant cumulative impact? |
|---|---|---|
| | | of the study area; therefore, cumulative impacts were assessed. Although significant PM 2.5 and PM 10 concentration levels were determined, ambient conditions for these pollutants already exceed CAAQS levels. |
| Hydrology and Water Quality | 5.6 | The current storm drain system is considered to be undersized; therefore, any additional flow would exacerbate this condition unless improvements to the existing system are made. All SDIA projects must adhere to the SWMP; therefore, water quality impacts would be less than significant individually and cumulatively. |
| Historic, Architectural, Archaeological, Paleontological and Cultural Resources | 5.7 | AMP Project would not incrementally contribute to a significant cumulative impact because there would be no impacts to historic/cultural resources. |
| Biotic Communities/Endangered & Threatened Species | 5.8 | AMP Project would not incrementally contribute to a significant cumulative impact because it would not directly affect sensitive vegetation communities or valuable habitat and because other reasonably foreseeable projects would not affect California least terns. |
| Wetlands | 5.9 | AMP Project would not incrementally contribute to a significant cumulative impact because only 0.1 acre of isolated, disturbed (and non-jurisdictional) wetland habitat would be affected by the AMP Project. |
| Coastal Resources | 5.10 | AMP Project would not incrementally contribute to a significant cumulative impact to coastal resources because it would be consistent with the coastal resources management and planning policies of the California Coastal Act, and because other developments in the Coastal Zone also would be required to be consistent with these policies. |
| Utilities and Service Systems | 5.11 | AMP Project would not incrementally contribute to a significant cumulative impact because service providers would be able to accommodate proposed SDIA improvements and other projected developments. |
| Light Emissions | 5.12 | AMP Project would not incrementally contribute to a significant cumulative impact because the project site is already in an urbanized area and is highly illuminated. |
| Aesthetics | 5.13 | AMP Project would not incrementally contribute to a significant cumulative impact because it would be in compliance with applicable aesthetic design guidelines and visual resource plans and policies. |

**Summary of Cumulative Impacts by Topic**

| Topic | AMP FEIR Section | Incremental contribution to significant cumulative impact? |
|---|---|---|
| Geology and Soils | 5.14 | AMP Project would not incrementally contribute to a significant cumulative impact because geology and soils impacts would be confined to the airport study area and would not add to the geology and soils impacts of other area projects. |
| Hazards and Hazardous Materials | 5.15 | AMP Project would not incrementally contribute to a significant cumulative impact because measures would be taken during construction to limit potential for impacts, and hazards associated with the NTC site would be mitigated separately. |
| Human Health Risk Assessment | 5.16 | As with the air quality analysis, the HHRA included long range plans for increased traffic due to forecast demand. Although the AMP Project contributes incrementally to human health risk effects, the non-cancer effects found for 2015 are attributable primarily to the pollutant acrolein and the impacts are likely overstated due to the aircraft engine speciation profiles used in the analysis. |
| Public Services | 5.17 | AMP Project would not incrementally contribute to a significant cumulative impact because new developments can be accommodated and because new public services are added as required. |
| Recreation | 5.18 | AMP Project would not incrementally contribute to a significant cumulative impact because it would have virtually no effect on recreational resources. |

The AMP FEIR cumulative impacts analyses consider the SDIA AMP Project as a whole, including both the Airport Implementation Plan and the Airport Land Use Plan without a distinction between the two. The types of improvements contemplated under the Proposed Project are included in the Airport Land Use Plan. The addition of those improvements to the Airport Implementation Plan, improvements already addressed in the AMP FEIR as part of the Airport Land Use Plan, does not change the basic conclusions of the cumulative impacts analyses in the AMP FEIR. Those conclusions are considered to still be valid and applicable to the Proposed Project; no further analysis is warranted.

**c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Potentially Significant Impact.** As indicated in the discussions above, implementation of the Proposed Project has the potential to result in significant impacts that may have not been fully addressed in the AMP FEIR. Although all of the currently proposed improvements were fully considered in the AMP FEIR relative to impacts associated with the Airport Land Use Plan, the current proposal to amend the adopted AMP Airport Land Use Plan and Airport Implementation Plan in light of additional project details regarding certain Northside Development area improvements

warrants the preparation of additional information and analysis to supplement the AMP FEIR. Specifically, additional information and analysis for impacts that could directly or indirectly impact people is warranted relative to aesthetics.

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