

Draft Program Environmental Impact Report for the Montgomery-Gibbs Executive Airport Master Plan

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Montgomery-Gibbs Executive Airport Master Plan Program Environmental Impact Report

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Acronyms and Abbreviations

°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
AAM	Annual Arithmetic Mean
AB	Assembly Bill
AC	Advisory Circular
ACM	asbestos containing material
ADD	Assistant Deputy Director
ADL	aerially deposited lead
ADMRT	Air Dispersion Modeling and Risk Tool
AEDT	Aviation Environmental Design Tool
AEP	Airport Emergency Plan
AF	acre feet
AFFF	Aqueous film forming foam
AIA	Airport Influence Area
Airport	Montgomery-Gibbs Executive Airport
AIP	Airport Improvement Program
ALP	Airport Layout Plan
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMP	Airport Master Plan
AMSL	above mean sea level
AOA	Airport Operating Area
APS	alternative planning strategy
APUs	auxiliary power units
AQIA	Air Quality Impact Assessment
ASLA	American Society of Landscape Architects Invasive Plant Guide
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
ATADS	Air Traffic Activity Data System
ATCT	Air Traffic Control Tower
avgas	aviation gasoline
BAAQMD	Bay Area Air Quality Management District
BCC	Bird of Conservation Concern
BCME	Biological Construction Mitigation/Monitoring Exhibit
BLA	Boundary Line Adjustment
BMPs	best management practices
BUOW	burrowing owl
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency

CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal-IPC	California Invasive Plant Council
CAL-NAGPRA	California Native American Graves Protection and Repatriation Act
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Control Board
CBC	California Building Code
CBSC	California Building Standards Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CHRIS	California Historical Resources Information System
CIP	Capital Improvements Program
City	City of San Diego
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
CPUC	California Public Utilities Commission
CRC	California Residential Code
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Ranks
CSPP	Construction Safety and Phasing Plan
CUPA	Certified Unified Program Agency
CVOC	chlorinated volatile organic compounds
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DEH	Department of Environmental Health
DIF	development impact fee
DOC	California Department of Conservation
DOT	Department of Transportation
DPM	diesel particulate matter

DTSC	Department of Toxic Substances Control
ECC	emerging chemical of concern
EIR	Environmental Impact Report
EMS	emergency medical services
EMT	emergency medical technician
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPP	Essential Public Projects
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FAR	floor area ratio
FBO	Fixed Base Operators
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FC	candidate for federal listing
FE	Federally Endangered
FP	Federally Protected
FR	Federal Register
FT	Federally Threatened
GA	general aviation
General Plan	City of San Diego General Plan
GHG	greenhouse gas
GPS	Global Positioning System
H&SC	Health and Safety Code
HELIX	HELIX Environmental Planning, Inc.
HFCs	hydrofluorocarbons
HI	Hazard Index
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
HMP	Hydromodification Management Plan
hp	horsepower
HRA	health risk assessment
HRB	Historical Resources Board
HRS	Hazard Ranking System
HRTR	Historical Resource Technical Report
HVAC	heating, ventilation, and air conditioning
Hz	hertz
I-	Interstate
IA	Implementing Agreement
IFS	Impact Fee Studies
ILS	Instrument Landing System

in/sec	inches per second
IWRP	Integrated Water Resources Plan
kHz	kilohertz
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
LDM	Land Development Manual
L _{DN}	Day Night sound level
L _{EQ}	time-averaged noise level
LID	low impact development
LOS	level of service
LUAGs	Land Use Adjacency Guidelines
MALSR	Medium Intensity Approach Lighting System with Runway Alignment
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
mg/m ³	milligrams per cubic meter
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendant
MM	mitigation measure
MMC	Mitigation Monitoring and Coordination
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MOC II	Metropolitan Operations Complex
mPa	micro Pascals
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	metric tons
MWD	The Metropolitan Water District of Southern California
MYF	Montgomery-Gibbs Executive Airport
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NAVAIDS	navigational aids
NE	Narrow Endemic
NeT	NPDES eReporting Tool
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO	nitrogen oxide

NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NPIAS	National Plan of Integrated Airport Systems
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OITC	Outdoor-Indoor Sound Transmission Class
OPR	Office of Planning and Research
OSHA	Occupational and Safety Health Administration
PAC	Planning Advisory Committee
PAPI	Precision Approach Path Indicator
Pb	lead
PCBs	Polychlorinated Biphenyls
PCE	tetrachloroethylene
PCI	Pavement Condition Index
PEIR	Program Environmental Impact Report
PFAS	per- and polyfluoroalkyl substances
PFCs	perfluorocarbons
PM	particulate matter
PM _{2.5}	fine particulate matter with an aerodynamic diameter of 2.5 microns or less
PM ₁₀	respirable particulate matter with an aerodynamic diameter of 10 microns or less
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
project	Improvements proposed within the AMP, excluding those within the private leasehold areas
PUD	Public Utilities Department
RAQS	Regional Air Quality Strategy
RASP	Regional Aviation Strategic Plan
RCRA	Resource Conservation and Recovery Act
REILs	Runway End Identifier Lights
REL	Reference Exposure Limits
RMS	root mean square
ROFA	runway object free areas
ROG	reactive organic gases
RPZ	Runway Protection Zone
RRP	Renovation, Repair, and Painting Rule
RSA	runway safety areas

RTP	regional transportation plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SAN	San Diego International Airport
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SC	candidate for state listing
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDMC	San Diego Municipal Code
SDPD	San Diego Police Department
SDRHR	San Diego Register of Historic Resources
SDSU	San Diego State University
SDWA	Safe Drinking Water Act
SE	state listed endangered
SF	square feet/foot
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SIP	State Implementation Plan
SLCP	short-lived climate pollutants
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SPL	sound pressure level
SR	State Route
SSC	Species of Special Concern
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SY	square yard
TACs	toxic air contaminants
TAF	Terminal Area Forecast
T-BACT	Toxics-Best Available Control Technology
TCE	trichloroethylene
TCMs	Transportation Control Measures
TMDL	Total Maximum Daily Load
TOFA	taxiway object free area
TPA	transit priority area

TPH	total petroleum hydrocarbons
TSM	Transportation Study Manual
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
VdB	vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
VPHCP	Vernal Pool Habitat Conservation Plan
WL	Watch List
WMP	Waste Management Plan
WPCP	Water Pollution Control Plan
WTP	water treatment plant
WQIP	Water Quality Improvement Plan

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SUMMARY

This Program Environmental Impact Report (PEIR) for the proposed Montgomery-Gibbs Executive Airport (referred to as the “Airport” or by its Federal Aviation Administration [FAA] identifier “MYF”) Master Plan and other associated discretionary actions (the “project”) has been prepared in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000, et seq.) and in accordance with the City of San Diego’s (City’s) CEQA *Significance Determination Thresholds* (City 2022a).

The proposed Airport Master Plan (AMP) incorporates relevant policies from the City of San Diego General Plan (General Plan), and provides a long-range, comprehensive policy framework and vision for future operations, the capacity of airport infrastructure, and facility requirements. The proposed AMP provides an evaluation of options to meet those needs, a phasing plan for implementing improvements, and a funding plan for the identified improvements.

A PEIR is intended to inform decision-makers and the general public of the potential significant environmental impacts of a proposed project. The PEIR also considers the availability of mitigation measures to minimize significant impacts and evaluates reasonable alternatives to the proposed AMP that may reduce or avoid one or more significant environmental effects.

S.1 Proposed Project

S.1.1 Project Location and Setting

The City Airports Division owns and operates MYF as a general aviation airport located within the Kearny Mesa community. The Airport is located within the Kearny Mesa Community Plan area in the City. The Airport is bound by Balboa Avenue to the north, Ruffin Road to the east, Aero Drive to the south, and State Route (SR) 163 to the west. MYF encompasses approximately 550 acres, located approximately six miles north of downtown San Diego, California, 20 miles south of Escondido, California, 11 miles west of El Cajon, California, and 22 miles north of Tijuana, Mexico.

MYF is the closest general aviation airport to downtown San Diego and is accessible via Interstate (I-) 805, SR 163, and I-15 from the north and south and via I-8 and SR 52 from the east and west. The Airport is surrounded by industrial/business park uses to the north and east, commercial uses to the west, and a mix of industrial/business park, commercial, and residential uses to the south along Aero Drive.

S.1.2 Project Description

The proposed AMP presents the community and airport’s vision for a 20-year strategic development plan based on the forecast of activity. The AMP is used as a decision-making tool and is intended to complement other local and regional plans. It articulates a long-range, comprehensive policy framework and vision for future operations, the capacity of airport infrastructure, facility requirements (the airport’s needs based on the forecast and compliance with FAA Airport Design Standards), development and evaluation of options to meet those needs, a phasing plan for

implementing improvements, and a funding plan for the identified improvements. In addition, the AMP documents the existing conditions of the Airport.

S.2 Project Objectives

In accordance with CEQA Guidelines Section 15124(b), the following specific objectives for the proposed AMP support the purpose of the AMP, to assist the City as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and, if necessary, will ultimately aid the lead agency in preparing findings and overriding considerations. The primary goals, recommendations, and objectives of the AMP are as follows:

1. Implement safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria.
2. Adapt to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies.
3. Accommodate regional demand for hangar, tie-down, and terminal building space utilizing phased implementation schedule for the proposed improvements.
4. Maintain a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities.
5. Preserve natural and historic resources within airport lands.

S.3 Areas of Controversy

To initiate the public scoping process for this PEIR in accordance with CEQA, the City circulated a Notice of Preparation (NOP) on February 7, 2019, for a 30-day public review and comment period. The City held a public scoping meeting on February 21, 2019. CEQA-related issues of potential concern raised in response to the NOP include issues related to transportation and circulation, energy and fuel conservation, noise, project objectives, air quality and greenhouse gas emissions, health and safety, the use of lead fuel, visual character, aircraft flight patterns, tribal cultural resources and historic resources, parks and recreation, public facilities, and biological resources. A request was made for the topics of air quality, biological resources, energy conservation, geology and soils, greenhouse gas emissions, health and safety, hydrology and water quality, land use, noise, paleontological resources, public services and facilities, public utilities, the proposed construction schedule, and animal conservation to be addressed in the PEIR. These issues have been identified as areas of known concern and are addressed throughout this PEIR. The NOP and comment letters are included in this PEIR as Appendix A.

S.4 Alternatives

To fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project,

which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

Alternatives to the proposed project are evaluated in Chapter 8, *Alternatives*, of this PEIR. The evaluations analyze the ability of each alternative to further reduce or avoid the significant environmental effects of the proposed project. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis. This PEIR evaluates four alternatives to the project: No Project Alternative, Existing 2008 Airport Layout Plan (ALP), Reduced Project Alternative, and Wetlands Avoidance Alternative.

S.4.1 No Project Alternative (No Airside or Landside Improvements)

The No Project Alternative would not implement any airside or landside improvements as part of the existing or proposed project, outside of any standard improvements needed for maintenance. The existing Runway 28R and Runway 5 displaced thresholds would remain intact, and none of the airside improvements, including removal of pavement at the end of Runway 5 and Taxiway F, reconfigurations of several other taxiways, and construction of new run-up areas would occur. In addition, the proposed landside improvements, including the expansion of the Terminal Building, construction of 92 hangars, 48 tie-down areas, public viewing area, and unleaded aviation gasoline (avgas) fuel tank would not occur.

The purpose of evaluating the No Project Alternative is to provide a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives. The No Project Alternative represents what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved.

S.4.2 Existing 2008 Airport Layout Plan Alternative

Under the Existing 2008 ALP Alternative, as updated by Kimley-Horn in 2014 (Kimley-Horn 2014), development would occur as guided by the most recently approved ALP for MYF, which was approved by the FAA in 2008. Planned improvements in the 2008 ALP include redevelopment in the western area with new General Aviation facilities, which would involve demolition of the historic large box hangars and aircraft parking. Other improvements include rehabilitation of Runway 5/23, rehabilitation of Taxiways A, B, C, D, H, K, relocation of Runway 5 threshold, and demolition of a portion of Taxiway G and construction of Taxiway G1 in a new location.

S.4.3 Reduced Project Alternative

Under the Reduced Project Alternative, the removal of the displaced threshold at Runway 28R would not occur, and the corresponding related improvements would not be constructed, including the

hold bay at Taxiway A, the Medium Intensity Approach Lighting System with Runway Alignment (MALSR) lighting, and the Precision Approach Path Indicator (PAPI).

The other airside improvements would remain the same as the proposed project, including the removal of pavement at the end of Runway 5 and Taxiway F, the construction of a new hold bay located off Taxiway H, along with reconfigurations of several other taxiways.

The landside components would remain the same as the proposed project, including construction of up to 92 new hangars, 48 new tie-down areas, the 6,400-square foot (SF) expansion to the existing terminal building, along with other improvements such as a public viewing area (outside the fence line), and an unleaded fuel tank.

S.4.4 Wetlands Avoidance Alternative

Under the Wetlands Avoidance Alternative, the removal of the displaced threshold at Runway 28R would still occur but some of the corresponding related improvements would not be constructed, including the hold bay at Taxiway A, the MALSR lighting, and the access roads to the MALSR, to avoid impacts to biologically sensitive wetlands (vernal pool).

The other airside improvements would remain the same as the proposed project, including the PAPI, the removal of pavement at the end of Runway 5 and Taxiway F, the construction of a new hold bay located off Taxiway H, along with reconfigurations of several other taxiways. The landside components would remain the same as the proposed project, including construction of up to 92 new hangars, 48 new tie-down areas, the 6,400 SF expansion to the existing terminal building, along with other improvements such as a public viewing area (outside the fence line), and an unleaded fuel tank.

S.4.5 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an Environmentally Superior Alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the Environmentally Superior Alternative, another Environmentally Superior Alternative must be identified.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the Environmentally Superior Alternative. This alternative would not result in potentially significant impacts associated with biological resources; historic, archaeological, and tribal cultural resources; hazards and hazardous materials; and construction vibration. The No Project Alternative would not meet the objectives of the project, except for Objective 5. Safety improvements associated with bringing the Airport into compliance with current FAA regulations would not occur, which may result in decreased operational safety associated with future aircraft operations.

Of the remaining alternatives, the Environmentally Superior Alternative is the Reduced Project Alternative, as it would avoid the unavoidably significant biological resource and land use impacts associated with consistency with the Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Vernal Pool Habitat Conservation Plan (VPHCP). However, mitigation associated with

sensitive species, sensitive habitats, wetlands, greenhouse gases (GHGs), historical resources, human remains, hazardous materials, noise, and vibration would still be required. Other impacts that were considered less than significant for the project would be further lessened under the Reduced Project Alternative.

The Reduced Project Alternative would fulfill three objectives of the project, including accommodating regional demand for hangar, tie-down, and terminal space; maintaining a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities; and preserving natural and historic resources within Airport lands.

The Reduced Project Alternative would only partially fulfill two important stated objectives for the project, including implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria; and adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies.

S.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact

Table S-1, *Summary of Impacts and Proposed Mitigation*, summarizes the results of the environmental analysis, including the potentially significant environmental impacts of the proposed project and proposed mitigation measures to reduce or avoid these impacts. Table S-2, *Summary of Cumulative Impacts*, summarizes the AMP's cumulative impacts on the environment. Significant and unavoidable direct and cumulative impacts due to the implementation of the project have been identified in the issue areas of Biological Resources and Land Use of this PEIR.

Impacts and mitigation measures are organized by issue in Chapter 5, *Environmental Analysis*. Chapter 5 also includes discussions of proposed policies that would reduce identified impacts. Chapter 6, *Cumulative Impacts*, includes an analysis of cumulative impacts of the proposed project for each issue.

Pursuant to CEQA Guidelines Section 15126, all components associated with the proposed project are considered in this PEIR at the program level when evaluating potential impacts on the environment, including the construction of future development and supporting facilities and utilities.

**Table S-1
SUMMARY OF IMPACTS AND PROPOSED MITIGATION**

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
5.1 AIR QUALITY				
Conflicts with Air Quality Plans	The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant	No mitigation is necessary.	Less than Significant
Air Quality Standards	The proposed project would not result in a violation of an air quality standard or contribute substantially to an existing or projected air quality violation.	Less than Significant	No mitigation is necessary.	Less than Significant
Sensitive Receptors	The proposed project would not expose sensitive receptors to substantial pollutant concentrations, including toxins.	Less than Significant	No mitigation is necessary.	Less than Significant
Odors	The proposed project would not create objectionable odors affecting a substantial number of people.	Less than Significant	No mitigation is necessary.	Less than Significant
5.2 BIOLOGICAL RESOURCES				
Sensitive Species	The proposed project could result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program (MSCP) or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS).	Potentially Significant	• MM BIO-1: Project-specific Biological Resource Surveys • MM BIO-2: San Diego Mesa Mint • MM BIO-3: San Diego Fairy Shrimp • MM BIO-4: Coastal California Gnatcatcher • MM BIO-5: Burrowing-Owl Pre-construction Survey • MM BIO-6: Burrowing-Owl Occupied Habitat • MM BIO-7: Crotch's Bumble Bee • MM BIO-10: Construction Plan Requirements	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Sensitive Habitats	The proposed project could result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development Manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.	Potentially Significant	- MM BIO-8: Sensitive Habitat Mitigation Ratios - MM BIO-10: Construction Plan Requirements	Less than Significant
Wetlands	The proposed project could result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.	Potentially Significant	- MM BIO-8: Sensitive Habitat Mitigation Ratios - MM BIO-10: Construction Plan Requirements	Less than Significant
Wildlife Movement	The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.	No Impact	No mitigation is necessary.	No Impact
Conservation Planning	The proposed project could result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan (NCCP), or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.	Potentially Significant	MM BIO-9: MHPA Avoidance and/or Restoration	Significant and Unavoidable

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
5.3 GEOLOGY AND SOILS				
Seismic Hazards	The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides.	Less than Significant	No mitigation is necessary.	Less than Significant
Erosion and Sedimentation	The proposed project would not result in substantial soil erosion or loss of topsoil.	Less than Significant	No mitigation is necessary.	Less than Significant
Geologic Instability	The proposed project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the proposed AMP, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	Less than Significant	No mitigation is necessary.	Less than Significant
5.4 GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	The proposed project could generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment.	Potentially Significant	- MM GHG-1: Prohibition of Natural Gas Use in City Facilities - MM GHG-2: Construction and Demolition Waste Diversion	Less than Significant
Conflict with GHG Reduction Plans or Policies	The proposed project could conflict with the City's Climate Action Plan (CAP) or another applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs.	Potentially Significant	- MM GHG-1: Prohibition of Natural Gas Use in City Facilities - MM GHG-2: Construction and Demolition Waste Diversion	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
5.5 HISTORICAL, ARCHAEOLOGICAL, & TRIBAL RESOURCES				
Historic Structures, Objects, or Sites	The proposed project could result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site.	Potentially Significant	- MM HIST-1: Secretary of the Interior's Standards for the Treatment of Historic Properties - MM HIST-2: Evaluation of Historic Resources	Less than Significant
Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	The proposed project could result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries.	Potentially Significant	MM HIST-3: Human Remains	Less than Significant
Tribal Cultural Resources	The proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource.	Less than Significant	No mitigation is necessary.	Less than Significant
5.6 HUMAN HEALTH, PUBLIC SAFETY, AND HAZARDOUS MATERIALS				
Wildland Fire Risk	Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	Less than Significant	No mitigation is necessary.	Less than Significant
Hazardous Emissions and Materials in Proximity to Schools	Implementation of the proposed project would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school.	Less than Significant	No mitigation is necessary.	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Emergency Response Plans	Implementation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	Less than Significant	No mitigation is necessary.	Less than Significant
Hazardous Materials Sites	The improvement projects within the proposed project could be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment.	Potentially Significant	• MM HAZ-1: Construction Health and Safety Plan • MM HAZ-2: Soil Vapor Intrusion Assessment • MM HAZ-3: Phase I Environmental Site Assessment	Less than Significant
Areas of Potential Environmental Concern	The project area could be located within 1,000 feet of a known contamination, within 2,000 feet of a known Superfund site, or have a closed Department of Environmental Health (DEH) file.	Potentially Significant	• MM HAZ-1: Construction Health and Safety Plan • MM HAZ-2: Soil Vapor Intrusion Assessment • MM HAZ-3: Phase I Environmental Site Assessment	Less than Significant
Upset or Accidental Release of Hazardous Materials	The project could create a significant hazard to the public or environment through the reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.	Potentially Significant	• MM HAZ-1: Construction Health and Safety Plan • MM HAZ-2: Soil Vapor Intrusion Assessment • MM HAZ-3: Phase I Environmental Site Assessment	Less than Significant
Aircraft Hazards	The project would not result in a safety hazard for people residing or working in MYF's Airport Influence Area (AIA).	Less than Significant	No mitigation is necessary.	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
5.7 HYDROLOGY AND WATER QUALITY				
Flooding and Drainage Patterns	The proposed project would not result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff.	Less than Significant	No mitigation is necessary.	Less than Significant
Flood Hazard Areas	The proposed project would not place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map which would impede or redirect flood flows.	Less than Significant	No mitigation is necessary.	Less than Significant
Water Quality	The proposed project would not result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body.	Less than Significant	No mitigation is necessary.	Less than Significant
Groundwater	The proposed project would not deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge.	Less than Significant	No mitigation is necessary.	Less than Significant
5.8 LAND USE				
Conflict with Environmental Policies of Adopted Land Use Plans	Implementation of the proposed project could conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and, as a result, cause an indirect or secondary environmental impact.	Potentially Significant	• MM BIO-1: Project-specific Biological Resource Surveys • MM BIO-2: San Diego Mesa Mint • MM BIO-3: San Diego Fairy Shrimp • MM BIO-4: Coastal California Gnatcatcher • MM BIO-5: Burrowing-Owl Pre-construction Survey • MM BIO-6: Burrowing-Owl Occupied Habitat • MM BIO-7: Crotch's Bumble Bee	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
			• MM BIO-8: Sensitive Habitat Mitigation Ratios • MM BIO-10: Construction Plan Requirements • MM HIST-1: Secretary of the Interior's Standards for the Treatment of Historic Properties • MM HIST-2: Evaluation of Historic Resources • MM HIST-3: Human Remains	
Consistency with the Multiple Species Conservation Program Subarea Plan and Vernal Pool Habitat Conservation Plan	The proposed project could conflict with the provisions of the City's MSCP Subarea Plan (SAP) or other approved local, regional, or state habitat conservation plan.	Potentially Significant	• MM BIO-9: MHPA Avoidance and/or Restoration	Significant and Unavoidable
Consistency with Adopted Airport Land Use Compatibility Plans	The proposed project would not result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).	Less than Significant	No mitigation is necessary.	Less than Significant
Community Division	Implementation of the proposed project would not physically divide an established community.	No Impact	No mitigation is necessary.	No Impact
5.9 NOISE				
Ambient Noise	The proposed project would not result in or create a significant increase in the existing ambient noise levels.	Less than Significant	No mitigation is necessary.	Less than Significant
Noise – Land Use Compatibility	The proposed project would not cause exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan.	Less than Significant	No mitigation is necessary.	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Aircraft Noise	The proposed project would not result in land uses which are not compatible with aircraft noise levels as defined by an adopted ALUCP.	Less than Significant	No mitigation is necessary.	Less than Significant
San Diego Municipal Code – On-site Generated Noise	The proposed project could result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the San Diego Municipal Code (SDMC).	Potentially Significant	MM NOI-1: Operational Property Line Limits	Less than Significant
Construction Noise	The proposed project could result in the exposure of people to significant temporary construction noise.	Potentially Significant	- MM NOI-2: Construction Noise Level Standards - MM NOI-3: Construction Noise Management Plan	Less than Significant
Vibration	The proposed project could result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Potentially Significant	MM VIB-1: Construction Vibration Limits Near Historic Structures	Less than Significant
5.10 PUBLIC SERVICES AND FACILITIES				
Public Facilities	The proposed project would not promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, fire/life safety protection, parks or other recreational facilities, schools, or libraries), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.	Less than Significant	No mitigation is necessary.	Less than Significant
5.11 PUBLIC UTILITIES				
Water Supply	The proposed project would not use excessive amounts of water beyond projected available supplies.	Less than Significant	No mitigation is required.	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
Utilities	The proposed project would not promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.	Less than Significant	No mitigation is required.	Less than Significant
Solid Waste Management	The proposed project would not result in impacts to solid waste management, including the need for construction of new solid waste infrastructure; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in Assembly Bill (AB) 341 and the City's CAP.	Less than Significant	No mitigation is required.	Less than Significant
5.12 TRANSPORTATION				
Conflict with Plans/Policies	Implementation of the project would not generate vehicular traffic or affect the local transportation network in a manner that would conflict with an adopted program, plan, ordinance, or policy addressing the circulation system.	Less than Significant	No mitigation is required.	Less than Significant
Vehicle Miles Traveled	The proposed project would not generate vehicle miles traveled (VMT) that would exceed thresholds in the City Transportation Study Manual (TSM).	Less than Significant	No mitigation is required.	Less than Significant
Traffic Hazards	The proposed project would not increase traffic hazards due to a design feature or incompatible uses.	Less than Significant	No mitigation is required.	Less than Significant
Emergency Access	The proposed project would not result in inadequate emergency access	Less than Significant	No mitigation is required.	Less than Significant

Environmental Issue	Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
5.13 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER				
Scenic Vistas or Views	Implementation of the proposed project would not result in a substantial obstruction of a vista or scenic view from a public viewing area identified in the Kearny Mesa Community Plan.	Less than Significant	No mitigation is required.	Less than Significant
Neighborhood Character	Implementation of the proposed project would not result in a substantial alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area.	Less than Significant	No mitigation is required.	Less than Significant
Landform Alteration	The proposed project would not result in a substantial change in the existing landform.	Less than Significant	No mitigation is required.	Less than Significant
Light and Glare	The proposed project would not create substantial light or glare which would adversely affect daytime or nighttime views in the area.	Less than Significant	No mitigation is required.	Less than Significant
Loss of Distinctive or Landmark Trees	The proposed project would not result in the loss of any distinctive or landmark tree(s) or stand of mature trees as identified in the Kearny Mesa Community Plan.	Less than Significant	No mitigation is required.	Less than Significant

**Table S-2
SUMMARY OF CUMULATIVE IMPACTS**

Environmental Issue	Geographic Scope of the Cumulative Analysis	Cumulatively Considerable Impact?
5.1 AIR QUALITY		
Conflicts with Air Quality Plans	The San Diego Air Basin (SDAB).	No.
Air Quality Standards	The SDAB.	No.
Sensitive Receptors	The area in the immediate vicinity of the AMP improvements.	No.
Odors	The area immediately surrounding potential odor sources.	No.
5.2 BIOLOGICAL RESOURCES		
Sensitive Species	Land covered under the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and the City's Vernal Pool Habitat Conservation Plan (VPHCP).	Not cumulatively considerable with implementation of MM BIO-1 through MM BIO-10.
Sensitive Habitats	Land covered under the City's MSCP SAP and VPHCP.	Not cumulatively considerable with implementation of MM BIO-1 through MM BIO-10.
Wetlands	Land covered under the City's MSCP SAP and VPHCP.	Not cumulatively considerable with implementation of MM BIO-1 through MM BIO-10.
Wildlife Movement	Land covered under the City's MSCP SAP and VPHCP.	No.
Conservation Planning	Land covered under the City's MSCP SAP and VPHCP.	Yes, even with implementation of MM BIO-9.
5.3 GEOLOGY AND SOILS		
Seismic Hazards	Impacts are generally site-specific and not cumulative in nature.	No.
Erosion and Sedimentation	The watersheds downstream from the Airport.	No.
Geologic Instability	Impacts are generally site-specific and not cumulative in nature.	No.
5.4 GREENHOUSE GAS EMISSIONS		
Greenhouse Gas Emissions	The global atmosphere.	Not cumulatively considerable with implementation of MM GHG-1 and MM GHG-2.
Conflict with GHG Reduction Plans or Policies	The global atmosphere.	Not cumulatively considerable with implementation of MM GHG-1 and MM GHG-2.

Environmental Issue	Geographic Scope of the Cumulative Analysis	Cumulatively Considerable Impact?
5.5 HISTORICAL, ARCHAEOLOGICAL, & TRIBAL RESOURCES		
Historic Structures, Objects, or Sites	The Airport.	Not cumulatively considerable with implementation of MM HIST-1 and MM HIST-2.
Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	Areas with moderate and high cultural resource sensitivity within the City.	Not cumulatively considerable with implementation of MM HIST-3.
Tribal Cultural Resources	Areas with moderate and high cultural resource sensitivity within the City.	No.
5.6 HUMAN HEALTH, PUBLIC SAFETY, AND HAZARDOUS MATERIALS		
Wildland Fire Risk	Community of Kearny Mesa.	No.
Hazardous Emissions and Materials in Proximity to Schools	Community of Kearny Mesa.	No.
Emergency Response Plans	Community of Kearny Mesa.	No.
Hazardous Materials Sites	Impacts are generally site-specific and not cumulative in nature.	No.
Areas of Potential Environmental Concern	Impacts are generally site-specific and not cumulative in nature.	No.
Upset or Accidental Release of Hazardous Materials	Impacts are generally site-specific and not cumulative in nature.	No.
Aircraft Hazards	MYF's AIA.	No.
5.7 HYDROLOGY AND WATER QUALITY		
Flooding and Drainage Patterns	The watersheds downstream from the Airport.	No.
Flood Hazard Areas	Impacts are generally site-specific and not cumulative in nature.	No.
Water Quality	The watersheds downstream from the Airport.	No.
Groundwater	Groundwater aquifers underlying the Airport and nearby area.	No.
5.8 LAND USE		
Conflict with Environmental Policies of Adopted Land Use Plans	Community of Kearny Mesa.	No.

Environmental Issue	Geographic Scope of the Cumulative Analysis	Cumulatively Considerable Impact?
Consistency with the Multiple Species Conservation Program Subarea Plan and Vernal Pool Habitat Conservation Plan	Land covered under the City's MSCP SAP and VPHCP.	Yes, even with implementation of MM BIO-9
Consistency with Adopted Airport Land Use Compatibility Plans	Community of Kearny Mesa.	No.
Community Division	Community of Kearny Mesa.	No.
5.9 NOISE		
Ambient Noise	Areas with noise-sensitive receptors surrounding the Airport.	No.
Noise – Land Use Compatibility	Community of Kearny Mesa.	No.
Aircraft Noise	Community of Kearny Mesa.	No.
San Diego Municipal Code – On-site Generated Noise	Properties adjacent to the Airport.	Not cumulatively considerable with implementation of MM NOI-1.
Construction Noise	Areas with noise-sensitive receptors surrounding the Airport.	Not cumulatively considerable with implementation of MM NOI-2 and MM NOI-3.
Vibration	Historic-age structures at the Airport.	Not cumulatively considerable with implementation of MM VIB-1.
5.10 PUBLIC SERVICES AND FACILITIES		
Public Facilities	Community of Kearny Mesa.	No.
5.11 PUBLIC UTILITIES		
Water Supply	City of San Diego.	No.
Utilities	City of San Diego.	No.
Solid Waste Management	City of San Diego.	No.
5.12 TRANSPORTATION		
Conflict with Plans/Policies	City of San Diego.	No.
Vehicle Miles Traveled	City of San Diego.	No.
Traffic Hazards	City of San Diego.	No.
Emergency Access	City of San Diego.	No.

Environmental Issue	Geographic Scope of the Cumulative Analysis	Cumulatively Considerable Impact?
5.13 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER		
Scenic Vistas or Views	Community of Kearny Mesa.	No.
Neighborhood Character	Community of Kearny Mesa.	No.
Landform Alteration	Community of Kearny Mesa.	No.
Light and Glare	Community of Kearny Mesa.	No.
Loss of Distinctive or Landmark Trees	Community of Kearny Mesa.	No.

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1.0 INTRODUCTION

This Program Environmental Impact Report (PEIR) for the proposed Montgomery-Gibbs Executive Airport (referred to as the “Airport” or by its Federal Aviation Administration [FAA] identifier “MYF”) Master Plan and other associated discretionary actions (the “project”) has been prepared in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000, et seq.) and in accordance with the City of San Diego’s (City’s) CEQA *Significance Determination Thresholds* (City 2022a).

The Airport Master Plan (AMP) documents the existing conditions of the airport; forecasts future operations; provides an assessment of the capacity of airport infrastructure and facility requirements (the airport’s needs based on the forecast and compliance FAA Airport Design Standards); evaluates options to meet those needs; develops a phasing plan for implementing improvements and provides a funding plan for the identified improvements.

1.1 PEIR Purpose and Intended Uses

In accordance with CEQA Guidelines Section 15121, the purpose of this PEIR is to provide public agency decision-makers and members of the public with detailed information about the potential significant environmental effects of the project, possible ways to minimize its significant effects, and reasonable alternatives that would reduce or avoid any identified significant effects. This PEIR is informational in nature and is intended for use by decision-makers, Responsible or Trustee Agencies as defined under CEQA, other interested agencies or jurisdictions, and the general public. The PEIR includes recommended mitigation measures which, when implemented, would lessen project impacts and provide the City’s Airports Division, the lead agency as defined in Article 4 of the CEQA Guidelines (Sections 15050 through 15051), with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the proposed AMP are presented to evaluate scenarios, policies, and/or regulations that would further reduce or avoid significant impacts associated with the project.

In accordance with CEQA Guidelines Section 15168, a PEIR may serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the proposed AMP area, the City finds no new or substantially more severe significant effects could occur, or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, the City can approve the activity as being within the scope covered by this PEIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or EIR).

1.2 PEIR Legal Authority

1.2.1 Lead Agency

The City's Airports Division is the lead agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The lead agency, as defined by CEQA Guidelines Section 15367, is the public agency that has the principal responsibility and authority for carrying out or approving a project. On behalf of the lead agency, the City's Planning Department conducted a preliminary review of the project and determined that a PEIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

The FAA is a federal lead agency for the project's review process under the National Environmental Policy Act, which is addressed under a separate environmental document.

1.2.2 Responsible and Trustee Agencies

State law requires that EIRs be reviewed by Responsible and Trustee Agencies. Responsible Agencies, as defined by CEQA Guidelines Section 15381, are public agencies that may have discretionary approval authority for a project. Trustee Agencies are defined in Section 15386 of the CEQA Guidelines as state agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California. Implementation of the proposed project may require subsequent actions and/or consultation from Responsible or Trustee Agencies. A brief description of some of the primary Responsible or Trustee Agencies that may have an interest in the project is provided below.

1.2.2.1 U.S. Army Corps of Engineers

The United States Army Corps of Engineers (USACE) has jurisdiction over development in or affecting the navigable waters of the United States, pursuant to two federal laws: the Rivers and Harbors Act of 1889 and the Clean Water Act (CWA), as amended. A "navigable water" is generally defined by a blue line as plotted on a United States Geological Survey (USGS) quadrangle map. Projects that include potential dredge or fill impacts to waters of the U.S. (defined as direct fill or indirect effects of fill) are subject to Section 404 of the CWA. Impacts to waters of the U.S. greater than one-half acre require an individual permit. All permits issued by the USACE are subject to consultation and/or review by the United States Fish and Wildlife Service (USFWS) and the United States Environmental Protection Agency (USEPA). No permits from the USACE are required at this time; however, future development projects within the Airport may require review and/or USACE permits.

1.2.2.2 U.S. Fish and Wildlife Service

Acting under the Federal Endangered Species Act (FESA), the USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as the USACE or FAA) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, the USFWS and FAA will provide input to the USACE as part of the Section 404 and Section 7 processes. Section 7 of the FESA regulates actions that could impact endangered or threatened species. Section 7 generally describes a process of federal interagency consultation and

issuance of a biological opinion and incidental take statement when federal actions may adversely affect listed species. The role of USFWS is limited to areas covered by the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Vernal Pool Habitat Conservation Plan (VPHCP). For listed species covered by the SAP, the USFWS has granted take authorization to the City in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, the USFWS, and the California Department of Fish and Wildlife (CDFW) in 1997. For future projects that are consistent with the City's MSCP SAP and VPHCP, the City has the authority to grant permits for take of covered species and a separate permit is not required from the wildlife agencies. For listed species not included on the MSCP SAP or VPHCP covered species list, the wildlife agencies retain permit authority. No permits from the USFWS are required at this time; however, development projects implemented under the proposed project may require review and/or USFWS permits in the future.

1.2.2.3 California Department of Fish and Wildlife

The CDFW has the authority to reach an agreement with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, pursuant to Section 1600 et seq. of the California Fish and Game (CFG) Code. The CDFW generally evaluates information gathered during preparation of the environmental documentation and attempts to satisfy their permit concerns in these documents. Where state listed threatened or endangered species not covered by the City's MSCP or VPHCP occur on a project site, the CDFW would be responsible for the issuance of a Memorandum of Understanding to ensure the conservation, enhancement, protection, and restoration of state listed threatened or endangered species and their habitats. No permits from the CDFW are required at this time; however, development projects implemented under the proposed project may require review and/or permits in the future.

1.2.2.4 California Department of Transportation

The proposed AMP area is adjacent to California Department of Transportation (Caltrans) facilities, including State Route (SR) 163 and Interstate (I-) 805. No permits from Caltrans are required at this time; however, Caltrans approval would be required for any encroachments or construction of facilities in a Caltrans right-of-way associated with future projects within the proposed AMP area.

1.2.2.5 San Diego Regional Water Quality Control Board

The San Diego Regional Water Quality Control Board (RWQCB) regulates water quality through the Federal CWA Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0109266. The RWQCB is responsible for implementing permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff, including overseeing the development and implementation of Water Quality Improvement Plans (WQIPs) as required by the Regional Municipal Separate Storm Sewer System (MS4) Permit for the San Diego region, which includes the City, as well as ensuring that all other MS4 permit requirements are met. No permits from the RWQCB are required at this time; however, future development projects within the proposed AMP area may require review and/or Section 401 certifications.

1.2.2.6 San Diego County Regional Airport Authority

The San Diego County Regional Airport Authority (SDCRAA) serves as San Diego County's Airport Land Use Commission (ALUC) and is responsible for land use planning as it relates to public safety surrounding the region's airports. As a Responsible Agency, SDCRAA, acting as the ALUC, would review the proposed AMP and future development proposals within the proposed AMP area and make "consistency determinations" with the provisions and policies set forth in the Montgomery Field Airport Land Use Compatibility Plan (ALUCP) up until the time the ALUC determines the proposed AMP is consistent with the ALUCP. Future development projects within the proposed AMP area would be subject to the noise, safety, overflight, and airspace protection policies in the ALUCP for Montgomery Field, which also include the Code of Federal Regulations (CFR), Part 77 requirement to provide notification to the FAA as addressed in the ALUCP.

1.3 EIR Type, Scope and Content, and Format

1.3.1 Type of EIR

This EIR has been prepared as a PEIR, as defined in Section 15168 of the CEQA Guidelines. In accordance with CEQA, this PEIR examines the environmental impacts of the proposed AMP, which comprises a series of actions. The combined actions can be characterized as one large project for the purpose of environmental review in this PEIR and are herein collectively referred to as the "project." The PEIR focuses on the physical changes in the environment that would result from adoption and implementation of the project, described in Chapter 3.0, *Project Description*, including anticipated general impacts that could result during future construction and operation.

1.3.2 PEIR Scope and Content

The scope of analysis for this PEIR was determined by the City as a result of initial project review, as well as consideration of comments received in response to the Notice of Preparation (NOP) circulated February 7, 2019, and a scoping meeting held on Thursday February 21, 2019 at the Metropolitan Operations Complex (MOC II) Auditorium located at 9192 Topaz Way, San Diego, California 92123. The NOP for analysis of the project, related letters received, and comments made during the scoping meeting are included as Appendix A of this PEIR. Through these scoping activities, the project was determined to have the potential to result in significant environmental impacts to the following subject areas:

- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Human Health, Public Safety, and Hazardous Materials
- Historical, Archaeological, and Tribal Cultural Resources
- Hydrology and Water Quality
- Land Use
- Noise
- Public Services and Facilities
- Public Utilities
- Transportation
- Visual Effects and Neighborhood Character

The intent of this PEIR is to determine whether implementation of the project would have a significant effect on the environment through analysis of the issues identified during the scoping process. The environmental analysis for the project is presented in the Environmental Analysis chapter in this PEIR (Sections 5.1 through 5.13). Each environmental issue area presented in this chapter includes presentation of threshold(s) of significance for the particular issue area under evaluation based on the CEQA Guidelines and the City's CEQA Significance Determination Thresholds (City 2022a); identification of an issue statement; an assessment of impacts associated with implementation of the proposed project; a summary of the significance of project impacts; and recommendations for mitigation measures and mitigation monitoring and reporting, as appropriate.

Pursuant to CEQA Guidelines Section 15126, discretionary actions associated with the proposed AMP are considered at the program-level in this PEIR when evaluating potential impacts on the environment, including the construction of future development and supporting facilities and infrastructure. Impacts are identified as direct or indirect, and short-term or long-term, and are assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the project compared to existing ground conditions.

The PEIR includes mandatory contents of EIRs as required pursuant to CEQA Guidelines Sections 15120 through 15132. The cumulative impacts analysis for each specific environmental issue area is presented in Chapter 6.0, *Cumulative Impacts*. Chapter 7.0, *Other Mandatory Discussion Areas*, presents the following: (1) a brief discussion of potential growth-inducing impacts; (2) environmental effects that were evaluated as part of the initial scoping and review process for the project and were found not to be potentially significant; and (3) unavoidable significant environmental impacts and significant irreversible environmental changes.

Chapter 8.0, *Alternatives*, of this PEIR includes a discussion of Alternatives that could avoid or reduce potentially significant environmental effects associated with implementation of the project.

For the purposes of the analysis in this PEIR, the baseline year is 2018 (unless otherwise noted), and the horizon year representing future buildout conditions under the proposed AMP is 2037. In cases where current data is not available, the most recent known data is used to depict existing conditions. The horizon year of 2037 represents the target year of the proposed AMP when projects and programs are anticipated to be fully implemented. However, full implementation of the proposed AMP may take more or less than 20 years.

1.3.3 PEIR Format

A brief overview of the various chapters of this PEIR is provided below:

- **Executive Summary** (CEQA Guidelines Section 15123). Provides a summary of the PEIR, a brief description of the project, identification of areas of controversy, issues to be resolved by the decision-makers, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and significance of impact after mitigation. A summary of the project alternatives and comparison of the potential impacts of the alternatives with those of the project is also provided.

- **Chapter 1.0, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.
- **Chapter 2.0, Environmental Setting** (CEQA Guidelines Section 15125). Provides a description of the project's regional context, location, existing airside and landside facilities, and historical aircraft operations. The Environmental Setting chapter provides background information relevant to each environmental issue area further addressed in Sections 5.1 through 5.12. Within the proposed AMP impact analysis chapter, the applicable environmental setting discussion contained in Chapter 2.0 is referenced to avoid repetition.
- **Chapter 3.0, Project Description** (CEQA Guidelines Section 15124). Provides a detailed discussion of the proposed AMP, including the local planning context, facility needs assessment summary, AMP components, phasing, the AMP's relationship to local land use plans, and other agency approvals.
- **Chapter 4.0, Regulatory Framework.** Provides a summary of the applicable federal, state, and local environmental laws and requirements relevant to each issue area. Within the proposed AMP impact analysis chapter, the applicable regulatory framework discussion contained in Chapter 4.0 is referenced to avoid repetition.
- **Chapter 5.0, Environmental Analysis** (CEQA Guidelines Section 15126). Provides a detailed evaluation of potential environmental impacts associated with the improvements proposed within the AMP for environmental issues determined through the initial review and public scoping process to be potentially significant. The analysis of each issue begins with a reference to the environmental setting and regulatory framework provided in Chapters 2.0 and 4.0, respectively, and a statement of the specific threshold(s) used to determine significance of impacts, followed by an evaluation of potential impacts. If significant impacts are identified, feasible mitigation measures to avoid or reduce any significant impacts are identified. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is provided.
- **Chapter 6.0, Cumulative Impacts** (CEQA Guidelines Section 15130). Provides a detailed discussion of the proposed project's incremental effects combined with other planned projects. According to CEQA Guidelines Section 15065, "cumulatively considerable" means the incremental effects of an individual project are considerable when viewed in connection with the effect of past projects, the effect of other current projects, and effects of probable future projects as defined in CEQA Guidelines Section 15130.
- **Chapter 7.0, Other Mandatory Discussion Areas.**
 - o **Growth Inducement** (CEQA Guidelines Section 15126.2[d]). Evaluates the potential influence the project may have on economic or population growth within the proposed AMP area, as well as the region, either directly or indirectly.
 - **Effects Found Not to Be Significant.** Identifies the issues determined in the scoping and preliminary environmental review process to be not significant for the project, and briefly summarizes the basis for these determinations. For the proposed AMP, it

was determined that environmental issues associated with agriculture and forestry resources, energy, mineral resources, paleontological resources, population and housing, recreation, and wildfire would not be significant, and, therefore, are summarized in Chapter 7.0.

- o **Unavoidable Significant Impacts/Significant Irreversible Environmental Changes** (CEQA Guidelines Sections 15126[b] and 15126[c]) provides a summary of significant unavoidable impacts of the proposed AMP as detailed in Chapter 5.0. This chapter also describes the potentially significant irreversible changes that may be expected and addresses the use of nonrenewable resources and energy use anticipated during project implementation.
- **Chapter 8.0, Alternatives** (CEQA Guidelines Section 15126.6). Provides a description of alternatives to the proposed AMP, including the No Project (Adopted Master Plan) and the Reduced Project Alternative.
- **Chapter 9.0, References Cited**. Lists the reference materials cited in the PEIR.
- **Chapter 10.0, Individuals and Agencies Consulted/List of Preparers** (CEQA Guidelines Section 15129). Identifies the individuals and agencies contacted during preparation of the PEIR.

Technical reports, used as a basis for much of the environmental analysis in the PEIR, have been summarized in the PEIR, and are included as appendices to this PEIR. The technical reports and any updates or additional materials prepared for the project and their location in the PEIR are listed in the table of contents. Availability of the Draft PEIR and the technical appendices is discussed in Section 1.4.1, *Draft PEIR*.

1.3.4 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this PEIR, and their relationship to this PEIR is described. These documents are included in Chapter 9.0, *References Cited*, are hereby incorporated by reference, and are available for review at the City's Planning Department, located at 202 C St San Diego CA, 92101. Included within the list of materials incorporated by reference into this PEIR are the following:

- City of San Diego General Plan 2024 (Blueprint SD; City 2024a)
- City of San Diego Final Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update Program EIR (Final PEIR; City 2024b)
- City of San Diego Municipal Code (SDMC)
- City of San Diego Climate Action Plan (CAP; City 2022b)
- City of San Diego MSCP SAP (City 1997)
- City of San Diego VPHCP (City 2019)

1.4 PEIR Process

The City, as the CEQA lead agency, is responsible for the preparation and review of this PEIR. The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, and the second stage is the Final PEIR.

1.4.1 Draft PEIR

In accordance with SDMC Section 128.0306 and CEQA Guidelines Section 15105, the Draft PEIR is distributed for review to the public and interested and affected agencies for a review period of 45 days. The purpose of the review period is to allow the public an opportunity to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated” (CEQA Guidelines Section 15204). SDMC Section 128.0307 allows the Planning Director to approve requests for additional public review time from the affected officially recognized community planning group, in this case the Kearny Mesa Community Planning Group. Approval of additional review time shall not exceed 14 calendar days.

The Draft PEIR and related technical studies are available for review during the public review period at the offices of the Planning Department, located at 202 C Street, San Diego, California, 92101, and on the City’s CEQA webpage:

<https://www.sandiego.gov/ceqa/draft>

The Montgomery-Gibbs Executive Airport AMP website is:

<http://www.sdairportplans.com/the-airports/>

1.4.2 Final PEIR

Following the end of the public review period, the City, as the CEQA lead agency, will provide written responses to comments received on the Draft PEIR per CEQA Guidelines Section 15088. Comments and responses will be considered in the review of the PEIR. Responses to the comments received during public review, a Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations for impacts identified in the PEIR as significant and unavoidable, will be prepared and compiled as part of the PEIR finalization process. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR, which includes the MMRP, Findings, and Statement of Overriding Considerations, as being complete and in accordance with CEQA. The Final PEIR will be available for public review at least 14 days before the City Council public hearing to provide commenters the opportunity to review the written responses to their comment letters.

2.0 ENVIRONMENTAL SETTING

2.1 Regional Location and Airport Boundaries

The Airport is located approximately six miles north of downtown San Diego, California, 20 miles south of Escondido, California, 11 miles west of El Cajon, California, and 22 miles north of Tijuana, Mexico. It is the closest general aviation airport to downtown San Diego.

The AMP area is located within the Kearny Mesa community in the central portion of San Diego (Figure 2-1, *Regional Location*). Marine Corps Air Station (MCAS) Miramar is located to the north of the AMP area, the community of Tierrasanta is to the east, the community of Serra Mesa is to the south, and the community of Clairemont Mesa is located to the west.

The AMP area encompasses approximately 550 acres and is bound by Balboa Avenue to the north, Ruffin Road to the east, Aero Drive to the south, and Kearny Villa Road to the west. SR 163 runs north-south to the west and I-15 runs north-south to the east (Figure 2-2, *Airport Master Plan Area*).

2.2 Airport Facilities Overview

William “Bill” Gibbs founded MYF in 1937 as a single runway, turf airfield and it has grown since its inception to encompass three runways, 12 taxiways, several run up areas, a helicopter landing area, and other airside and landslide facilities as detailed in Figure 2-3, *MYF Existing Facilities*, and discussed in further detail below. MYF is classified by the FAA as a general aviation airport, which is defined as a public-use airport that does not have scheduled service or has less than 2,500 passenger boardings. Activities at MYF encompass all aviation except air carrier services (defined as engaging in air transportation interstate, overseas or the transportation of mail). The types of general aviation aircraft that operate at MYF include private, corporate, charter, air ambulance, law enforcement, fire rescue, flight training, and cargo (City 2025).

2.2.1 Airside Facilities

Airside components are those that directly support aircraft passenger-related operations including runways, taxiways, navigational aids (NAVAIDS), and apron areas. The primary airside components consist of three runways and 12 taxiways. Figure 2-4, *Existing Airside Facilities*, illustrates the main airside facilities.

2.2.1.1 Runways

There are three paved runways at MYF: Runway 10L/28R, which is an approximately 4,598-foot runway with a precision approach; Runway 10R/28L, which is an approximately 3,401-foot parallel runway; and Runway 5/23, which is an approximately 3,400-foot crosswind runway (see Table 2-1, *Runway System Characteristics*). The locations of the runways are shown on Figure 2-3.

**Table 2-1
RUNWAY SYSTEM CHARACTERISTICS**

Characteristics	Runway 10L/28R	Runway 10R/28L	Runway 5/23
Use	Primary	Secondary	Crosswind ¹
Length x Width (feet)	4,598 x 150	3,401 x 60	3,400 x 75
Displaced Threshold (feet)	N/A / 1,199	N/A	390 / N/A

Source: C&S Engineers 2019

¹ A runway in addition to a primary runway, a crosswind runway is designed to enhance safety during crosswind conditions.

2.2.1.2 Taxiways

Taxiway systems provide safe and efficient routes for aircraft movement to and from airport runways and apron areas (the areas where aircraft are parked, loaded/unloaded, re-fueled, or boarded). The type and location of taxiways in relation to a runway system have a substantial impact on airfield capacity. A full-length parallel taxiway serves Runways 10L/28R and 10R/28L and a partial-length parallel taxiway serves Runway 5/23. The airfield is also developed with a network of connectors and cross-field taxiways equipped with medium intensity taxiway edge lights. All the taxiways meet the Airport Reference Code B-II standard separation of 240 feet from runway to taxiway centerline.

2.2.1.3 Displaced Threshold

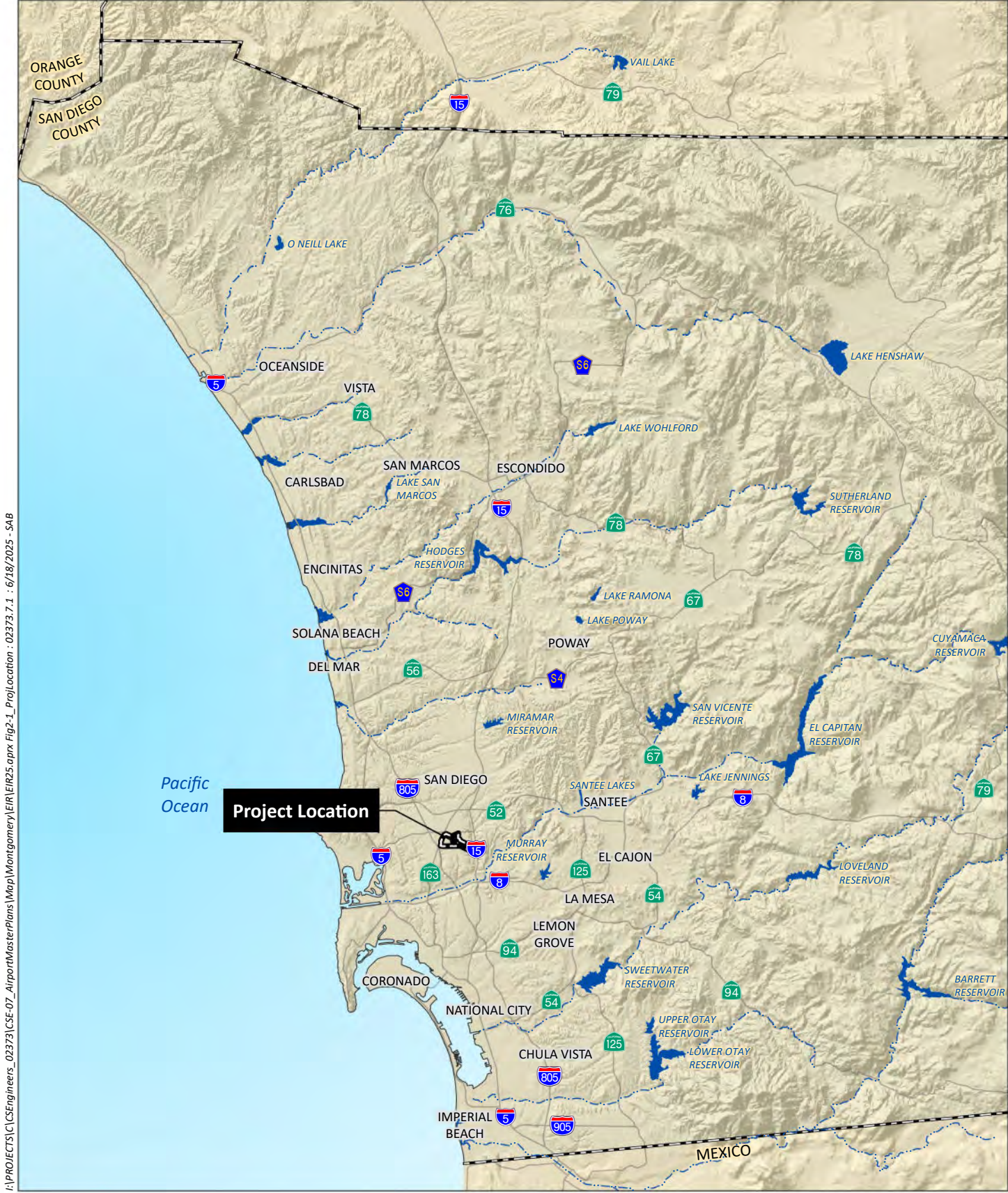
A displaced threshold is placed at the end of a runway with the purpose of changing the point at which an approaching aircraft will touch down on the runway. They are generally put in place to move the approach path of an aircraft away from an obstruction, such as a tower or building, which encroaches within the FAA defined airspace surface (i.e., areas that should be kept free of obstructions). The portion of the runway marked as a displaced threshold is permitted to be used during takeoff, but not during landing.

The Runway 28R threshold is displaced approximately 1,199 feet and the Runway 5 threshold is displaced approximately 390 feet. The displaced threshold was placed on the end of Runway 28R in 1995 when the runway was extended. The intent of the displaced threshold was to increase the length of runway available for takeoff but keep the landing distance the same. According to City Resolution R-280194, keeping the landing threshold at the current location would allow the Airport to continue to accommodate the existing aircraft fleet mix while limiting the use of larger aircraft that may not comply with previously established noise and weight limitations. Increasing the available takeoff distance would also allow departing aircraft to achieve a higher altitude prior to passing over residential areas.

A review of historical records found no explanation as to why the Runway 5 landing threshold was displaced. It was likely added to avoid obstructions or provide additional space between the existing hangar development located south of Runway 5 and the landing threshold.

2.2.1.4 Safety Areas and Object Free Areas

Runways and taxiways are surrounded by imaginary, rectangular areas known as runway safety areas (RSA) and runway object free areas (ROFA). The purpose of the RSA is to protect the aircraft in

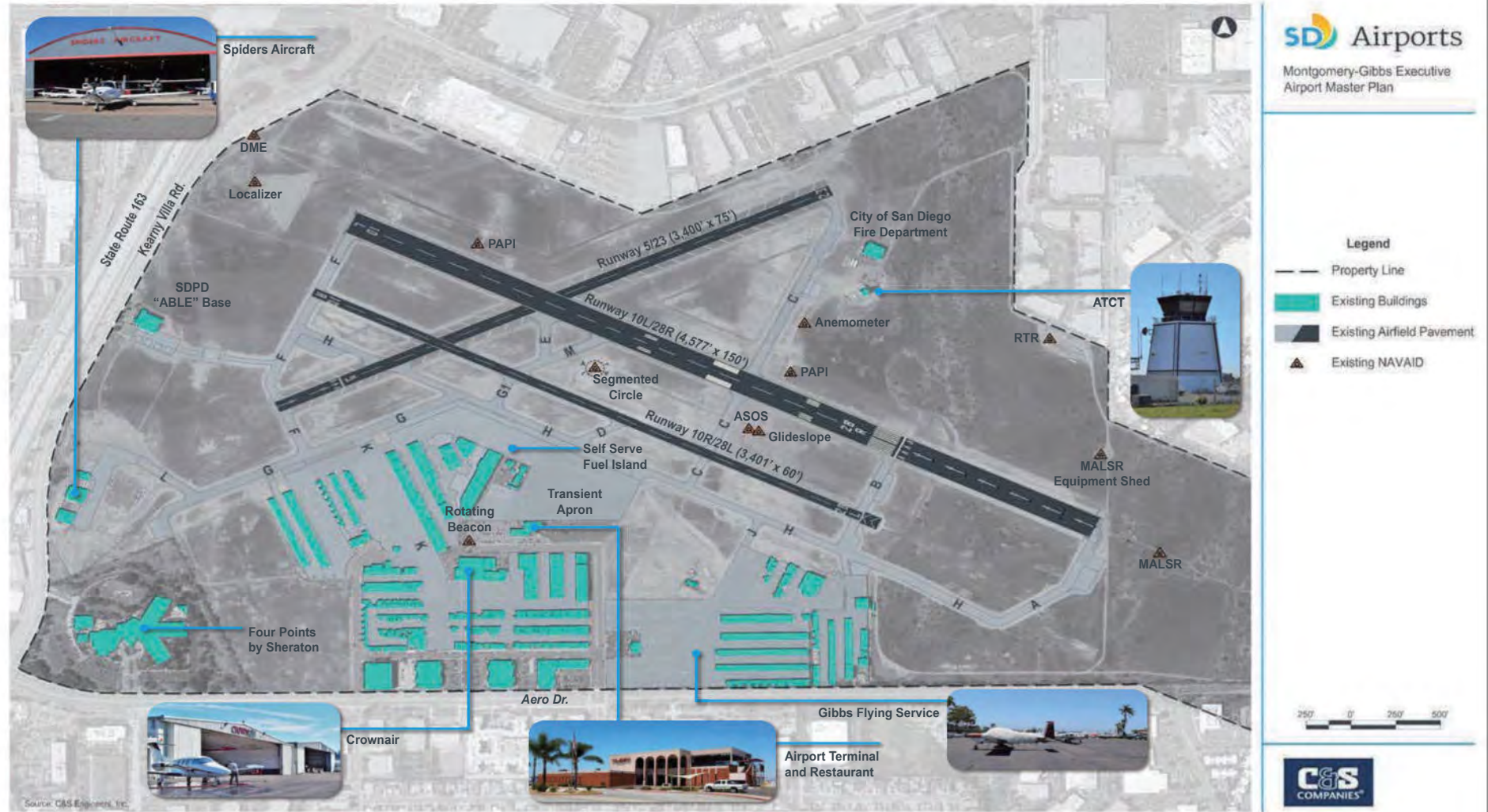


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Source: Base Map Layers (SanGIS, 2016)



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Source: C&S Companies 2018



Taxiway C Facing South



Air Traffic Control Tower



Airfield Signage

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the event of an under-shoot, over-shoot or excursion from a runway during landing or take-off operations. The RSA has specific grading requirements to slope away from the runway at 1.5 to 5.0 percent. Meeting RSA requirements is one of the FAA's highest priorities in maintaining safety at the nation's airports.

The function of the ROFA, also centered on the runway, is to enhance the safety of aircrafts operating on the runway. It is not permissible to park an airplane within the ROFA. The ROFA does not have specific slope requirements, but the terrain within the ROFA must be relatively smooth and graded to be at or below the edge of the RSA. The overall purpose of these areas is to minimize the probability of serious damage to aircrafts accidentally entering the area as well as to provide greater accessibility for firefighting and rescue equipment during such incidents. The current dimensions for RSAs and ROFAs at MYF are listed in Table 2-2, *MYF Runway Safety Area Dimensions*, and Table 2-3, *MYF Runway Object Free Area Dimensions*.

Table 2-2
MYF RUNWAY SAFETY AREA DIMENSIONS

Runway	RSA Width (feet)	Length Beyond Runway End (feet)
10L/28R	300	600
10R/28L	120	240
5/23	120	240

Source: C&S Engineers, Inc. 2019

Table 2-3
MYF RUNWAY OBJECT FREE AREA DIMENSIONS

Runway	ROFA Width (feet)	Length Beyond Runway End (feet)
10L/28R	800	600
10R/28L	250	240
5/23	250	240

Source: C&S Engineers, Inc. 2019

2.2.1.5 Runway Protection Zones

As defined by FAA Advisory Circular (AC) 150/5300-13B, the function of the Runway Protection Zone (RPZ) is to enhance the protection of people and property on the ground. This is best achieved by airport sponsor acquisition of property located within the RPZ and clearing it of incompatible land uses and obstructions. The RPZ is a trapezoidal shape centered on and extending out from the runway centerline. The type of aircraft that the runway accommodates as well as the approach visibility minimums determines the dimensions of an RPZ. Each runway has a separate approach and departure RPZ whose dimensions are identical unless visibility minimums are lower than one mile (which is the case for Runway 28R).

2.2.1.6 Lighting and Navigational Aids

Visual navigational aids are important for aircraft operating under visual flight rules and instrument flight rules.

Wind Cone

A wind cone is a conical textile tube that provides pilots with a visual indication of wind direction and velocity. The Airport has wind cones west of Taxiway J, and between Runways 10L/28R and 10R/28L.

Segmented Circle

A segmented circle is a visual aid designed to provide information about the traffic pattern to aircraft overhead. It is often co-located with a wind cone, as is the case at MYF.

Airport Beacon

A rotating beacon assists pilots in identifying the Airport at night. As a civilian airport, the beacon alternates between white and green flashing lights. The MYF beacon is located in the southwest corner of the administration building parking lot.

Medium Intensity Approach Lighting System

A Medium Intensity Approach Lighting System with Runway Alignment (MALSR) is installed on the end of Runway 28R. It is a configuration of lights positioned uniformly along the extended runway centerline to provide visual guidance to an aircraft approaching to land on a precision instrument approach procedure. The brightness of the MALSR is controllable by pilots during hours when the Air Traffic Control Tower (ATCT) is non-operational.

Runway End Identifier Lights

Runway End Identifier Lights (REILs) are installed at an airfield to provide rapid and positive identification of the approach end of a particular runway. The system consists of a pair of synchronized flashing lights located laterally on each side of the runway threshold. REILs are installed on the end of Runway 28L.

Precision Approach Path Indicator

A Precision Approach Path Indicator (PAPI) provides visual approach slope guidance during aircraft landing operations. The PAPI system consists of four light units, located adjacent to the runway and perpendicular to the runway centerline. PAPIs were recently installed on both the Runway 10L and Runway 28R ends.

Runway and Taxiway Edge Lighting

All taxiways are equipped with medium intensity taxiway edge lights. The Airport has several different runway lighting systems to facilitate operations at night or during periods of low visibility.

2.2.1.7 Electronic Aids to Navigation

Electronic NAVAIDS are utilized during periods when cloud ceilings are low and visibility is poor, and pilots must engage in instrument approach procedures. NAVAIDS are utilized through instrumentation in the aircraft as a part of in-route navigation and instrument approach procedures.

Runway 28R is the only runway that offers an instrument approach and as such is the only runway with dedicated electronic NAVAIDS.

Instrument Landing System

An Instrument Landing System (ILS) is an electronic ground-based system that provides both lateral and vertical guidance to an aircraft approaching and landing on a runway during periods of low ceilings and/or reduced visibility. The Glide Slope, Localizer, and Distance Measuring Equipment are all electronic components that make up the ILS. Runway 28R is the only runway equipped with an ILS at the Airport.

Area Navigation / Global Positioning System

Area navigation is the precursor to Global Positioning System (GPS) and uses a network of satellites and land stations to create reference points that allow users with the proper receivers to determine their position in the sky. GPS navigation can now provide highly accurate navigational data based on satellites alone.

2.2.1.8 Airfield Signage and Markings

Airfield signage and markings are used for navigational and safety purposes and include directional signage, information signage, and airfield markings.

2.2.1.9 Airspace and Air Traffic Control Tower

The FAA ATCT is in the northeast corner of the airfield and provides Air Traffic Control services to airport users. It is operational between the hours of 6:00 a.m. and 9:00 p.m. daily.

2.2.1.10 Additional Equipment

Additional equipment includes an automated surface observing system, which is a weather-sensing system, and an airfield electrical vault, located on the apron, north of the administration building. Airfield signage and markings are used for navigational and safety purposes.

2.2.1.11 Noise Monitoring System and Abatement Procedures

Although noise abatement procedures are not technically an airside facility, aircraft generated noise and overflight impacts to the surrounding community are an airspace concern and as such, may have an effect upon the planning of airside facilities.

In 1985, a noise monitoring system was installed to document the noise produced by aircraft operations at MYF and determine ways of reducing it. MYF has voluntarily enacted noise abatement procedures that are designed to reduce the amount of noise pollution in the surrounding community. These procedures include a combination of restricting departure times, positioning the use of louder aircraft on runways further from noise-sensitive land uses (NSLUs), and modifying flight operations during departures and ascents and landings and descents.

2.2.2 Landside Facilities

The landside portion of an airport are those areas that do not play a direct role in the aircraft operations. Landside facilities at MYF include the terminal building (including administrative offices and the restaurant), hotel, hangars, parking lots, entrance roads, and support facilities (see Figure 2-5, *Existing Landside Facilities*). While the City operates and maintains the administrative offices/terminal, and onsite circulation network, many of the landside facilities include functions operated by private tenants. Table 2-4, *Support Facility Tenants and Services Provided*, provides a list of the tenants that lease operational space at the MYF and the services they provide.

Table 2-4
SUPPORT FACILITY TENANTS AND SERVICES PROVIDED

Tenant Name	Service Provided
San Diego Police Air Support Unit	Air Support, Surveillance, Aerial Security, Search and Rescue
Advanced Aircraft Services	Aircraft Maintenance
Spiders Aircraft Service	Aircraft Maintenance
Coast Aircraft	Aircraft Maintenance, Hangar Rental, tie-downs
Aviation Unlimited	Aircraft Sales
San Diego Air Tours	Biplane Rides
Crownair Aviation (FBO)	Full Service 100LL/Jet-A, Self Service 100LL, Aircraft Maintenance, tie-downs
Gibbs Flying Service (FBO)	Full Service 100LL/Jet-A, Aircraft Maintenance, tie-downs
National Air College	Flight Training
San Diego Fire-Rescue Air Operations	Fire Fighting, Air Rescue, Patient Transport
ATP Flight School	Flight Training
Learn to Fly San Diego	Flight Training
San Diego Flight Training International	Flight Training
Coast Flight Training and Management	Flight Training, Aircraft Management
Armed Forces Aero Club	Flying Club
Plus One Flyers	Flying Club
Corporate Helicopters of San Diego	Helicopter Tours, Sales, Filming, Construction Projects
Marv Golden	Pilot Supplies
Four Points by Sheraton	Hotel
Casa Machado	Restaurant

Source: City of San Diego, C&S Engineers, Inc. 2019

2.2.2.1 Terminal Building

The terminal building is located at the end of John J. Montgomery Drive and directly adjacent to the transient aircraft apron. The terminal building at MYF is a two-story building constructed in 1969. Additionally, the multi-functional facility has undergone several updates since its construction in 1969, the most recent being in 2016. The existing terminal building has a footprint of 10,000 square feet (SF).

Administrative Offices

The terminal building houses the City's Airports Division Staff and the MYF operations center. There is also for-rent conference space.



Terminal Building



Aircraft Tie-downs



San Diego Police Air Support Unit Hangar

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Restaurant and Lobby

The second floor of the terminal building is entirely occupied by Casa Machado Restaurant. It offers an opportunity for pilots to dine without leaving the Airport and it allows anyone from the surrounding community to observe the Airport in operation. A publicly accessible lounge is located on the first floor of the terminal building.

2.2.2.2 Hotel

The Four Points by Sheraton San Diego hotel is located on the southwest corner of the airport property, at the intersection of Aero Drive and Kearny Villa Road. It resides on land leased from the City.

2.2.2.3 Aircraft Hangars and Tie-Down Facilities

The Airport has several leaseholders that offer both hangars and tie-down storage for based and transient aircraft use. Table 2-5, *Existing Montgomery-Gibbs Executive Airport Hangar/Tie-Down Facilities*, lists the different parking areas and the number of spaces available at each hangar and tie-down area, and discusses the operations associated with these airside facility leases.

Table 2-5
EXISTING MONTGOMERY-GIBBS EXECUTIVE AIRPORT HANGAR/TIE-DOWN FACILITIES

Lease Title / Area	Based / Transient ¹	Existing				Total Existing
		Tie-downs	T-Hangars	Box Hangars	Large Box Hangars (> 1 aircraft)	
Gibbs Aviation Services	Both	171	92	7	2	272
City Tie-downs	Both	30	-	-	-	30
Coast Flight ²	Based	4	36	1	1	42
Crownair	Both	N/A	-	16	26	42
Flattop East	Based	1	43	5	-	49
Flattop West	Based	8	21	3	1	33
Marigold Spots	Based	1	25	1	-	27
National Air College ³	Based	45	24	20	1	90
SD Fire Dept	Unknown					
SD Police ABLE Base	Unknown					
Spiders - Sorbi	Both	N/A	-	-	2	2
TOTAL		260	241	53	33	587

Source: City of San Diego, C&S Engineers, Inc. 2019

¹ A based aircraft is one that is based at the Airport either permanently or at least for the majority of the year, such as those owned by flight schools and flying clubs.

² Coast Flight has relocated to National Air College site. See Footnote 3, below.

³ National Air College has moved to Gillespie Field – will become Coast Flight.

2.2.2.4 Circulation, Access, and Parking

Vehicle Access

Primary access to the airfield via Aero Drive to John J. Montgomery Drive provides direct access to the terminal building, two large parking lots to the east and west of the terminal building, and the hangars and accessory structures within the Crownair Aviation and Coast Flight leaseholds, as well as the corporate helicopters area. John J. Montgomery is a north-south roadway from Aero Drive that extends northward until it reaches the east parking lot; then it turns west, provides access to a drop off area in front of the terminal building and then ends approximately 250 feet west of the terminal building.

Secondary access is provided via Aero Drive to Glenn H. Curtiss Road which ends in a cul-de-sac at the National Air College building. An internal road paralleling Aero Drive, Gibbs Drive extends east-westward connecting John J. Montgomery Drive and Glenn H. Curtiss Road.

Multi-Modal Access

There are sidewalks along Aero Drive from the intersection with Kearny Villa Road to the west and I-15 to the east. The sidewalk on the Airport side of Aero Drive is incomplete, but one is available on the other side of the street. There is a sidewalk on John J. Montgomery Drive leading to the administration building and an unimproved sidewalk (a graded dirt path) along Glenn H. Curtiss Road leading to the National Air College parking lot. There are crosswalks over Aero Drive at both John J. Montgomery Drive and Glenn H. Curtiss Road.

The Airport is served by Bus Route 25 (Fashion Valley – Kearny Mesa TC) and has stops at the intersection of Aero Drive with both John J. Montgomery Drive and Glenn H. Curtiss Drive. Stops are made approximately every 30 minutes.

Parking

The Airport has several public parking areas available. Parking is free during the day with available overnight parking for a fee. The two main lots are located on both the east and west sides of the administration building. Additionally, there is street parking along Glenn H. Curtiss Road, Gibbs Drive, and John J. Montgomery Drive. The different parking areas and number of spaces available are summarized in Table 2-6, *Public Parking at MYF*.

**Table 2-6
PUBLIC PARKING AT MYF**

Location	Spaces
Lot East of Administration Building	145
Lot West of Administration Building	73
Street Parking Along Glenn H. Curtiss Road	56
Street Parking Along Gibbs Drive	80
Street Parking Along John J. Montgomery Drive	59
TOTAL	413

Source: C&S Engineers, Inc. 2019

2.2.2.5 Support Facilities

Support facilities include those relating to aircraft maintenance, refueling, flight instruction, charter, flying clubs, and aircraft sales. Most of the services are provided by two Fixed Base Operators (FBO). MYF also provides facilities to accommodate emergency services.

Fixed Base Operators

MYF is home to two FBOs. Both Gibbs Aviation Service and Crownair Aviation offer full-service 100-low-lead (100LL) Aviation Gasoline and Jet-A fuel in underground tanks, as well as mobile fuel by trucks.

Gibbs Flying Service

The oldest aviation business located at the Airport, Gibbs Flying Service, was started in 1937 when Bill Gibbs relocated his pilot training business to the future site of Montgomery-Gibbs Executive Airport. Located east of John J. Montgomery Drive, it offers aircraft tie-downs, hangars, fueling, and aircraft maintenance services.

Crownair Aviation

Located west of the administration building is one of the largest leaseholds at the Airport, Crownair Aviation. They are a full-service FBO that caters to larger corporate business jets and turboprops as well as to smaller general aviation customers. Through a partnership with Epic Aviation, they are able to offer aircraft fueling, hangar rental, ground service equipment, aircraft maintenance, and aircraft/avionics sales.

Aircraft Maintenance and Supplies

The Airport has several locations that offer aircraft maintenance services including Advanced Aircraft Service, Crownair Aviation, Corporate Helicopters, Gibbs Flying Service, and Spiders Aircraft Service.

There are several businesses at the Airport to assist pilots in buying new aircraft or outfitting their old aircraft with new electronics and avionics.

Air Charter Services

MYF does not maintain FAA Part 139 Certification, which would allow for scheduled commercial service flights. However, MYF does handle a notable amount of air charter operations. In the 2016 calendar year, the FAA recorded 3,655 air charter flights. Air charter refers to an aircraft that is rented as whole rather than selling seats individually. The size of aircraft used are typically much smaller than those used by a commercial airline and range anywhere from approximately 4 to 20 seats. Crownair Aviation handles most of the air charter flights and Gibbs Flying Service is equipped to handle some of the smaller air charter aircraft.

Flight Instruction and Flying Clubs

Flight instruction accounts for a large portion of the operations at MYF. In 2016, local operations (those remaining in the traffic pattern or within 20 miles of the Airport) accounted for 98,680 out of

200,668 operations, or roughly 49 percent. Flight schools at the Airport include ATP Flight School, Coast Flight, Corporate Helicopters, Learn to Fly San Diego, National Air College, and San Diego Flight Training International. Most of the training fleet is made up of single-engine piston aircraft such as the Cessna 172, Piper Archer/Warrior/Arrow. There are also several small multi-engine piston aircraft such as the Piper Seminole/Seneca and Beechcraft Duchess.

Flying clubs offer an affordable alternative to aircraft ownership that allows more pilots to stay in the air. They generally charge a monthly membership fee and an hourly rate and give members access to a fleet of aircraft to choose from. Flying clubs at the Airport include the Armed Forces Aero Club, Plus One Flyers, Golden Wings, and Consair Flyers Club.

Emergency Services

The San Diego Police Air Support Unit bases several helicopters out of a hangar on the western boundary of the airfield. They are used for search and rescue, aerial security, and air support to patrol operations.

The Airport does not have a dedicated Aircraft Rescue and Firefighting station. The closest station to the Airport is Station 28, located at Kearny Villa Road and Aero Drive, directly across the street from the western boundary of the Airport.

The Airport is home to San Diego Fire-Rescue Air Operations that operate off a concrete pad just south of the ATCT. They are planning to expand their facility in the future. Their helicopters respond to over 400 emergencies each year including firefighting, air-rescue, shoreline rescue, and disaster assessment.

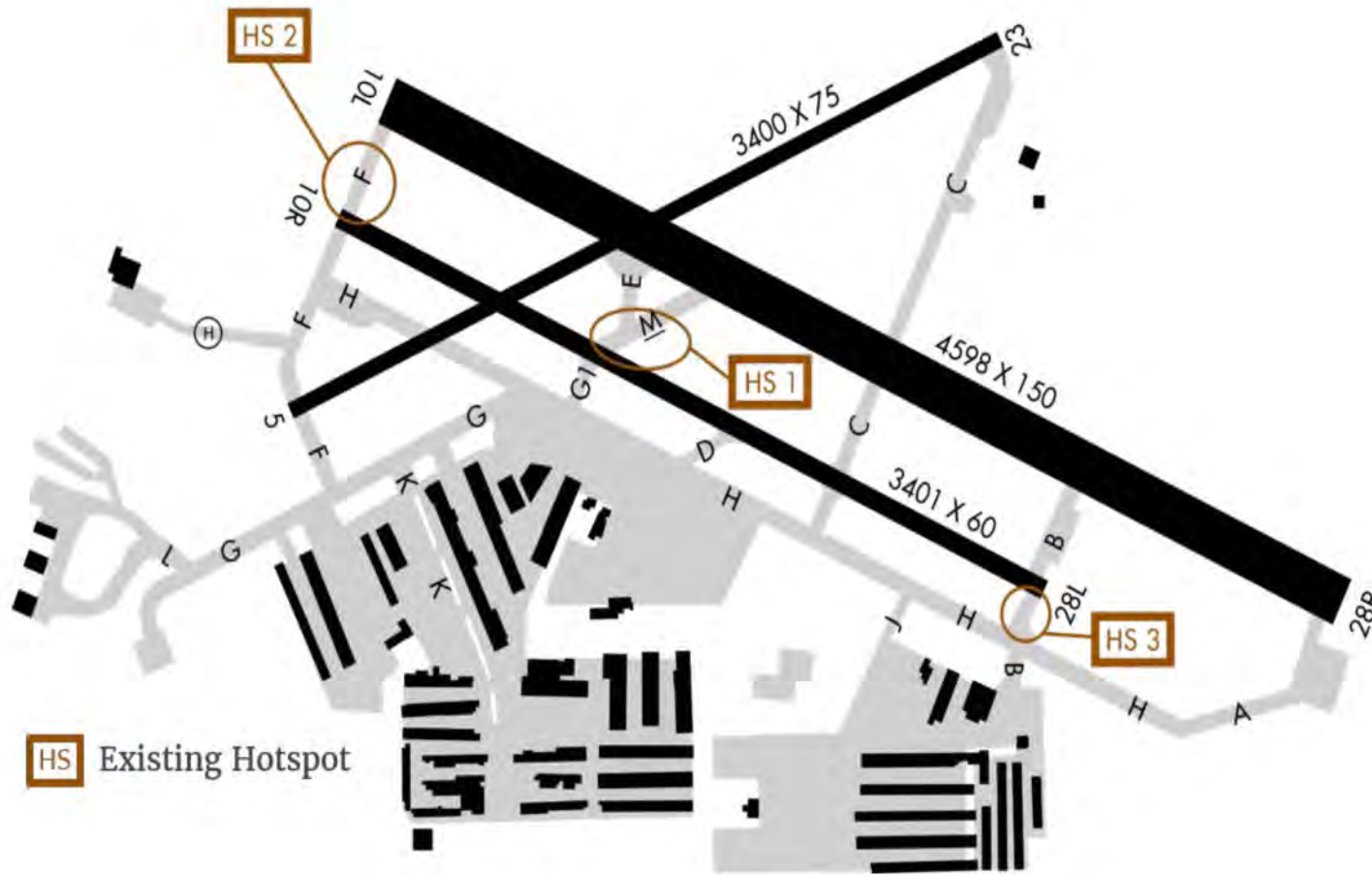
Mercy Air is a full-service air medical transport system. They have a helicopter based at the Airport that provides air ambulance services to local hospitals.

2.3 Airport Deficiencies

2.3.1 Airside Deficiencies

Within the airside facilities of MYF, there are three existing hotspots; a hotspot is defined by the FAA as a runway safety related problem area on an airport that presents increased risk during surface operations. Typically, it is a complex or confusing taxiway/taxiway or taxiway/runway intersection. The area of increased risk has either a history of or potential for runway incursions or surface incidents due to a variety of causes, such as but not limited to: airport layout; traffic flow; airport marking, signage and lighting; situational awareness; and training. As shown in Figure 2-6, *Existing Airfield Hotspots and Taxiway High Risk Area*, these areas are located on Taxiways B, E, and F. In addition to the three existing hotspots, a fourth area at the intersection of Taxiway A and Runway 28R has been identified by the FAA as having a high rate of runway incursion incidents.

Additionally, there are several other airside deficiencies that have been identified including the geometry and design of runways, taxiways, run-ups, and pavement conditions; these airside deficiencies, along with the hotspots and runway incursion incident area, are discussed in greater detail in Chapter 3.0, Project Description.



Source: C&S Companies 2019

2.3.2 Landside Deficiencies

Analysis conducted as part of the AMP determined that there is an existing deficiency in the availability of certain landside facilities. Primarily, under current operating conditions, aircraft parking apron areas are at capacity. In addition, based on current MYF activity, there is an existing deficit of 4,000 SF of administrative offices/terminal space. In addition to these specifically identified deficiencies, additional landside deficiencies or non-FAA compliant design features, such as those pertaining to taxi lanes and potential fencing vulnerabilities (allowing wildlife to access the site) have been identified. A more detailed discussion of landside deficiencies is contained within Chapter 3.0, Project Description, of this PEIR.

2.4 Historical Aircraft Operations

Historical operations data for MYF indicates that aircraft operations and airport activity fluctuate with the economy. In the beginning of 2009, when the most recent economic recession peaked, there was a decrease in aviation activity; however, by 2014, aviation activity again began to increase and has continued to increase annually. Historically and presently, general aviation continues to be the largest generating activity.

Aviation activity can be expressed in terms of airport operations (the total number of landings and take offs), which are classified as local and itinerant. Local operations are those operations performed by aircraft that remain in the local traffic pattern, execute simulated instrument approaches or low passes at the airport and operations to or from the airport and a designated practice area in a 20-mile radius of the ACTC. Itinerant operations are operations performed by aircraft, with either instrument flight rules, visual flight rules, or special visual flight rules that land at an airport, arriving from outside the airport area, or depart an airport and leave the airport area. Table 2-7, *MYF Historical Aircraft Operations Data*, during a 10-year reporting period, includes flight volumes for itinerant and local sources for the years from 2006-2016.

Table 2-7
MYF HISTORICAL AIRCRAFT OPERATIONS DATA

Calendar Year	Itinerant				Local			Total Operations
	Air Taxi	GA	Military	Sub-Total	Civil	Military	Sub-Total	
2006	3,756	122,732	742	127,230	104,965	503	105,468	232,698
2007	3,428	121,088	156	124,672	97,069	751	97,820	222,492
2008	3,114	125,137	237	128,503	103,074	63	103,137	231,640
2009	3,232	115,034	203	118,469	83,719	440	84,159	202,628
2010	3,023	108,043	319	111,389	80,291	188	80,479	191,868
2011	2,251	106,819	298	109,370	89,747	24	89,771	199,141
2012	2,741	91,930	382	95,059	88,564	161	88,725	183,784
2013	2,433	91,117	619	94,177	91,915	100	92,015	186,192
2014	3,151	100,995	525	104,673	110,368	79	110,447	215,120
2015	3,143	118,774	587	122,513	91,245	90	91,335	213,848
2016	3,655	97,429	717	101,801	98,680	187	98,867	200,668
Annual Average Growth Rate (5-year trend)				-0.55%			2.70%	0.48%
Annual Average Growth Rate (10-year trend)				-1.73%			0.05%	-1.19%

Source: C&S Engineers, Inc. 2019; GA = general aviation

Additionally, as discussed above and as is evident in Table 2-7, when separated by class, data reveals that an overwhelmingly large percentage of aircraft operations are general aviation. Specifically, as of 2016, general aviation aircraft operations comprise 97.7 percent of total aircraft operations, while air taxi (1.8 percent) and military (0.5 percent) collectively comprise less than three percent. General aviation aircraft operations at MYF include the following aircraft categories: single-engine, piston, multi-engine piston, turboprop, turbojet, rotorcraft/ helicopter, and military aircraft.

While Table 2-7 identifies the classes of historical and existing aircraft operations, Table 2-8, *2016 Operations at MYF*, identifies the types of planes that comprise all (itinerant and local) aircraft operations for the aircraft operations year 2016.

Table 2-8
2016 OPERATIONS AT MYF

Aircraft Type	Aircraft Count	Operations Percentage
Single Engine	167,997	83.7%
Multi Engine	19,721	9.8%
Turboprop	3,356	1.7%
Jet	3,673	1.8%
Military	904	Less than 1%
Rotorcraft	5,017	2.5%
TOTAL	200,668	100%

Source: C&S Engineers, Inc. 2019

It is also important to understand the number and type of based aircraft, since based aircraft, especially those owned by flight schools and flying clubs, can comprise a large percentage of overall aircraft operations. Data from May 2017 indicates that there is a total of 604 based aircraft housed at MYF, with approximately 84 percent of those aircraft being single engine piston aircraft (see Table 2-9, *Based Aircraft at MYF*).¹

Table 2-9
BASED AIRCRAFT AT MYF

Aircraft Type	Aircraft Count	Fleet Percentage
Single Engine	508	84.0%
Multi Engine	66	11.0%
Turboprop	6	1.0%
Jet	9	1.5%
Rotorcraft	15	2.5%
TOTAL	604	100%

Source: C&S Engineers, Inc. 2019

¹ According to the FAA TAF there were 470 based aircraft at MYF in 2016. This contradicts the validated number of 604 that was approved in the National Based Aircraft Inventory Program. Since this information was recently validated on 3/24/2017, meaning all aircraft identifiers (N-numbers) were reviewed and determined accurate, 604 was used as the existing number of based aircraft at MYF. Coordination with the FAA will be undertaken as part of the forecast approval process to ensure that this number is accurate, and the TAF updated.

Understanding the historical airport operation trends provide a foundation for the AMP components as outlined in Chapter 3.0 of this PEIR and evaluation of those components in the individual environmental issue areas is provided in Chapter 5.0 of this PEIR.

2.5 Existing Physical Characteristics

2.5.1 Air Quality

The proposed AMP area is located within the San Diego Air Basin (SDAB) of the San Diego County Air Pollution Control District (SDAPCD). Existing air quality conditions and local climate are described in this section. See additional information below, Section 5.1 of the PEIR, and Appendix B, Air Quality Technical Report (HELIX 2025a).

2.5.1.1 Climate

The climate in southern California, including the proposed AMP area, is controlled largely by the strength and position of the subtropical high-pressure cell over the Pacific Ocean. Areas within 30 miles of the coast experience moderate temperatures and comfortable humidity. Precipitation is limited to a few storms during the winter season. The climate of the area is characterized by hot, dry summers, and mild, wet winters.

The predominant wind direction in the vicinity of AMP area is from the west and the average wind speed is approximately six miles per hour (Iowa Environmental Mesonet 2020). The hottest month in the vicinity of the AMP area is August, with a mean maximum temperature of 80.9 degrees Fahrenheit (°F), and the coldest month is January, with a mean minimum temperature of 44.3°F. Total precipitation in the AMP area averages approximately 10 inches annually. Precipitation occurs mostly during the winter and is relatively infrequent during the summer (Western Regional Climate Center 2018).

Due to its climate, the SDAB experiences frequent temperature inversions (temperature increases as altitude increases, which is the opposite of general patterns). Temperature inversions prevent air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere, creating a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and nitrous dioxide react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving the air pollutants inland, toward the foothills. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and nitrogen dioxide (NO₂) emissions. High NO₂ levels usually occur during autumn or winter, on days with summer-like conditions.

2.5.1.2 Air Pollutants of Concern

Federal and state laws regulate air pollutants emitted into the ambient air by stationary and mobile sources. These regulated air pollutants are known as “criteria air pollutants,” and are categorized by primary and secondary standards. Primary standards are a set of limits based on human health effects. Secondary standards are another set of limits intended to prevent environmental and

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

- Ozone (O₃)
- Reactive organic gases (ROGs) or volatile organic compounds (VOCs)
- Carbon monoxide (CO)
- Nitrogen dioxide (NO₂)
- Particulate matter (PM), which is further subdivided:
 - o Respirable PM, 10 microns or less in diameter (PM₁₀)
 - o Fine PM, 2.5 microns or less in diameter (PM_{2.5})
- Sulfur dioxide (SO₂)
- Lead (Pb)

Criteria pollutants can be emitted directly from sources (primary pollutants; e.g., CO, SO₂, PM₁₀, PM_{2.5}, and lead), or they may be formed through chemical and photochemical reactions of precursor pollutants in the atmosphere (secondary pollutants; e.g., ozone, NO₂, PM₁₀, and PM_{2.5}). PM₁₀ and PM_{2.5} can be both primary and secondary pollutants. The principal precursor pollutants of concern are ROGs (also known as volatile organic compounds VOCs)² and nitrogen oxides (NO_x).

The descriptions of sources and general health effects for each of the criteria air pollutants are shown in Table 2-10, *Common Sources and Human Health Effects of Criteria Air Pollutants*. Specific adverse health effects on individuals or population groups induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables such as cumulative concentrations, local meteorology and atmospheric conditions, and the number and characteristics of exposed individuals (e.g., age, gender). Criteria pollutant precursors (ROG and NO_x) affect air quality on a regional scale, typically after significant delay and distance from the pollutant source emissions. Health effects related to ozone and NO₂ are, therefore, the product of emissions generated by numerous sources throughout a region. Emissions of criteria pollutants from on-road vehicles (mobile emissions) are distributed nonuniformly in location and time throughout the region, wherever the vehicles may travel.

² CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

Table 2-10
COMMON SOURCES AND HUMAN HEALTH EFFECTS OF CRITERIA AIR POLLUTANTS

Pollutant	Major Man-Made Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO ₂)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to climate change and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O ₃)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrogen oxides (NO _x) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM ₁₀ and PM _{2.5})	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and other sources.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO ₂)	A colorless, nonflammable gas formed when fuel containing sulfur is burned, when gasoline is extracted from oil, or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: CARB 2025a; USEPA 2025a

2.5.1.3 Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or in serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial

operations, painting operations, and research and teaching facilities. TACs are different than the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

The Health and Safety Code (§39655, subd. [a]) defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.” A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the CAA (42 United States Code Sec. 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through the California Air Resources Board (CARB), is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel Particulate Matter

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is less than 2.5 microns in diameter (CARB 2025b). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, the CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a significant impact on California’s population—it is estimated that about 70 percent of total known cancer risk related to air toxics in California is attributable to DPM (CARB 2025b).

Lead

Lead is a naturally occurring metallic element that is found in small amounts in the Earth’s crust. In addition to its status as a criteria pollutant, lead is listed as a TAC because, depending on the level and duration of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. There is also a probable link between lead exposure and kidney cancer, brain cancer (gliomas), and lung cancer (USEPA 2025b). Aviation gasoline (avgas) is the only remaining lead-containing transportation fuel in the United States. Lead in avgas prevents damaging engine knock, or detonation, which can result in a sudden engine failure. Lead particulate matter is emitted into the atmosphere in the exhaust from engines using leaded avgas. Lead particulate matter can also be emitted during demolition and renovation activities that disturb material that contains lead-based paint (LBP), most typically found in structures built before 1978.

Asbestos

Asbestos is a mineral fiber that naturally occurs in some rock and soil. Long-term exposure to airborne asbestos fibers has been linked to major health effects, including lung cancer; mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest, and the abdomen and heart; and asbestosis, a serious progressive, long-term, non-cancerous disease of the

lungs (CARB 2025b). Because of its fiber strength and heat resistance, asbestos has been used in a variety of building construction materials for insulation and as a fire retardant, primarily in buildings constructed before 1979. Asbestos fibers may be released into the air by the disturbance of asbestos containing material (ACM) during renovation and demolition activities; or during earth-disturbing activities in areas where naturally occurring asbestos is present in the rock or soil. Naturally occurring asbestos is not likely to be present in the soil and rock of San Diego County (CGS 2000).

2.5.1.4 Existing Air Quality

Attainment Designations

Areas that do not meet state or federal standards (California Ambient Air Quality Standards [CAAQS] and National Ambient Air Quality Standards [NAAQS]) for a particular pollutant are considered to be “nonattainment areas” for that pollutant. The SDAB is a nonattainment area for the NAAQS for ozone (8-hour). The SDAB is an attainment area or unclassified for the NAAQS for all other criteria pollutants including PM₁₀ and PM_{2.5}. The SDAB is currently classified as a nonattainment area under the CAAQS for ozone (1-hour and 8-hour), PM₁₀, and PM_{2.5} (SDAPCD 2019). The current federal and state attainment status for the SDAB is provided in Table 2-11, *Federal and State Air Quality Designations*.

Table 2-11
FEDERAL AND STATE AIR QUALITY DESIGNATIONS

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-hour)	(No federal standard)	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment
PM ₁₀	Unclassifiable ¹	Nonattainment
PM _{2.5}	Attainment	Nonattainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassified
Visibility	(No federal standard)	Unclassified

Source: SDAPCD 2025

¹ At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

Monitored Air Quality

The SDAPCD operates a network of ambient air monitoring stations throughout the San Diego region. The purpose of the monitoring stations is to measure ambient concentrations of criteria air pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The nearest ambient monitoring station to the AMP area is the San Diego – Kearny Villa Road monitoring station located approximately two miles north of the AMP area at 6125 Kearny Villa Road. This station monitors the following criteria air pollutants: O₃, NO₂, and PM_{2.5}. There are no monitoring stations in San Diego County with data for PM₁₀ in the last three years. Air quality data collected at

the San Diego – Kearny Villa Road monitoring station for the years 2021 through 2023 are shown in Table 2-12, *Summary of Air Quality Monitoring Data*.

Table 2-12
SUMMARY OF AIR QUALITY MONITORING DATA

Pollutant Standards	2021	2022	2023
Ozone (O₃)			
Maximum concentration 1-hour period (ppm)	0.095	0.095	0.091
Maximum concentration 8-hour period (ppm)	0.071	0.083	0.079
Days above 1-hour state standard (>0.09 ppm)	1	1	0
Days above 8-hour state/federal standard (>0.070 ppm)	2	2	3
Nitrogen Dioxide (NO₂)			
Maximum 1-hour concentration (ppm)	0.06	0.051	0.038
Days above state 1-hour standard (0.18 ppm)	0	0	0
Days above federal 1-hour standard (0.100 ppm)	0	0	0
Suspended Particulates (PM_{2.5})			
Maximum 24-hour concentration (µg/m ³)	20.9	13.9	24.5
Days above federal standard (>35 µg/m ³)	0	0	0

Source: CARB 2025c

ppm = parts per million; µg/m³ = micrograms per cubic meter

Monitoring data at the Kearny Villa Road station from 2021 to 2023 reported: one exceedance of the 1-hour state ozone standard in 2021 and 2022; exceedance of the 8-hour state/federal ozone standard on 2 days in 2021 and 2022, and on 3 days in 2023; no federal standard for PM_{2.5}; and no exceedances of the state or federal standards for NO₂ (CARB 2025c).

Aircraft-Related Operational Criteria Pollutant Emissions

Criteria pollutant emissions associated with 2017 aircraft operations at MYF are shown in Table 2-13, *2017 Aircraft-Related Operational Criteria Pollutant and Precursor Emissions*.

Table 2-13
2017 AIRCRAFT-RELATED OPERATIONAL CRITERIA POLLUTANT AND PRECURSOR EMISSIONS

Scenario	Maximum Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2017 Conditions	198.4	20.2	7,806.0	10.1	8.4	8.4

Source: HMMH 2019.

ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns

Aircraft-Related Operational Cancer Risk

As discussed above, the exhaust from piston-engine powered aircraft can contain lead, a known TAC. A health risk assessment (HRA) was conducted to evaluate increases in potential health risks from aircraft lead exhaust emissions. As part of this HRA, the cancer risk to sensitive receptors near the Airport was evaluated for 2017 aircraft operations at MYF and is shown in Table 2-14, *2017 Aircraft Exhaust Lead Cancer Risk*. Refer to Section 5.1, *Air Quality*, and Appendix B of this PEIR for the methodology and assumptions for the HRA. Cancer risk from exposure to a specific TAC source is

evaluated in terms of chances per million for that exposure beyond the individual's risk of developing cancer from existing background levels of pollutants in the ambient air. Aircraft exhaust is considered a mobile transportation source of emissions, and neither the City nor the SDAPCD have adopted thresholds to determine acceptable cancer risk to existing sensitive land uses from existing mobile transportation sources of TAC emissions. The 2017 cancer risk estimation data from exposure to aircraft exhaust lead for modeled sensitive receptor locations near the Airport are presented here for informational purposes. See Figure 4, *Modeled Sensitive Receptor Locations*, in Appendix B of this PEIR for a map of the evaluated sensitive receptor locations.

Table 2-14
2017 AIRCRAFT EXHAUST LEAD CANCER RISK

Receptor ID	Receptor Description	Chances per Million ¹
R1	Multi-Family residential	8.6
R2	Multi-Family residential	8.3
R3	Single-Family Residential	5.6
R4	Single-Family Residential	4.9
R5	Single-Family Residential	4.3
R6	Single-Family Residential	1.7
R7	Multi-Family residential	0.7
R8	Multi-Family residential	0.8
R9	Single-Family Residential	1.3
R10	Single-Family Residential	0.7
R11	Multi-Family residential	0.8
R12	Multi-Family residential	3.7
S1	Wegeforth Elementary School	1.3
S2	Soille San Diego Hebrew Day School	0.9
S3	La Petite Ecole du Lycée Français de San Diego	0.8
S4	Angier Elementary School	0.6
S5	SET High School	0.4
D1	Montessori School of Kearny Mesa	2.5
D2	Imagine Montessori Bilingual Preschool	0.7

Source HELIX 2025a

¹ Incremental excess cancer risk in chances per million from exposure to lead in the exhaust of aircraft operating at MYF beyond the individual's risk of developing cancer from existing background levels of pollutants in the ambient air.

2.5.2 Biological Resources

2.5.2.1 Vegetation Communities

A total of 11 vegetation communities/land cover types, including three wetland and eight upland, occur within the AMP area. The approximate acreages of these vegetation communities/land cover types are presented in Table 2-15, *Vegetation Communities/Land Use Types in the AMP Area*, and their locations within the AMP area are shown on Figure 2-7, *Vegetation Communities and Land Cover Types*. Refer to Figure 2-8, *Existing Biological Conditions*, for representative images of existing biological resources within the AMP area. Additional information is contained within Section 5.2 of this PEIR and Appendix C, Biological Resources Report (HELIX 2025b).

Table 2-15
VEGETATION COMMUNITIES/LAND USE TYPES IN THE AMP AREA¹

Vegetation Community or Land Cover Type²	Tier³	Inside MHPA	Outside MHPA	Total Area in AMP⁴
Southern willow scrub (63320) – incl disturbed phase	Wetland	1.15	0.02	1.17
Disturbed wetland (11200)	Wetland	0.45	0.01	0.46
Vernal pool (44000)	Wetland	8.27	1.01	9.28
Diegan coastal sage scrub (32500) – incl disturbed phase	II	90.4	7.4	97.8
Baccharis scrub (32530) – incl disturbed phase	II	10.7	0.5	11.2
Chamise chaparral (37200)	IIIA	4.2	1.2	5.4
Non-native grassland (42200)	IIIB	67.8	87.7	155.5
Eucalyptus woodland (79100)	IV	0.1	0.4	0.5
Disturbed habitat (11300)	IV	7.3	41.0	48.3
Non-native vegetation (11000)	--	0.2	0	0.2
Developed (12000)	--	7.2	150.3	157.5
TOTAL		197.8	289.5	487.3

¹ Excludes Not a Part areas (refer to Figure 2-7).

² Vegetation community codes are from Oberbauer (2008).

³ The City of San Diego Biology Guidelines divides vegetation into four tiers or sensitivity (the first includes the most sensitive, the fourth the least) based on rarity and ecological importance. Tier I habitats include lands classified as southern foredunes, Torrey pines forest, coastal bluff scrub, maritime succulent scrub, maritime chaparral, native grasslands, and oak woodlands. Tier II includes lands classified as coastal sage scrub and coastal sage scrub/chaparral. Tier IIIA includes lands classified as mixed chaparral and chamise chaparral. Tier IIIB includes lands classified as non-native grassland. Tier IV includes lands classified as disturbed, agriculture, and eucalyptus.

⁴ Totals reflect rounding (0.1 acre for uplands and 0.01 acre for wetlands/riparian).

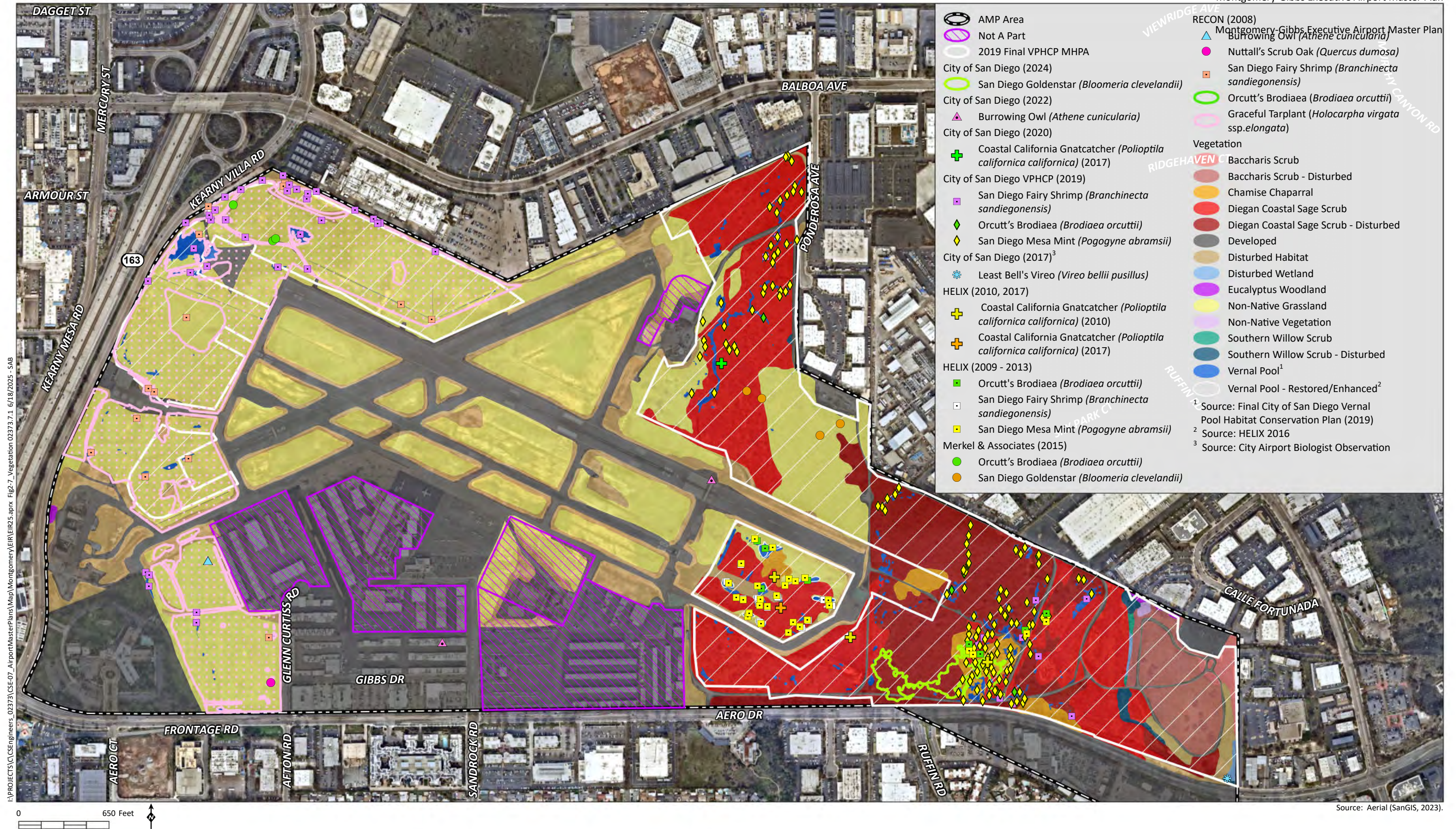
MHPA = Multi-habitat Planning Area; AMP = Airport Master Plan

Wetland Communities

Wetlands vegetation, including riparian areas, are low-lying lands where association (i.e., saturation or inundation) with water is the primary constituent in soil development and the types of plant and animal species living in the soil and on its surface. Wetland vegetation communities vary widely due to regional and local differences in soils, topography, climate, hydrology, water chemistry, vegetation, and other factors. In the AMP area, wetland vegetation communities/land cover types include vernal pool, southern willow scrub (including disturbed), and disturbed wetland. These individual wetland vegetation types and their locations within the AMP area are described below.

Vernal Pools

Vernal pools are ephemeral wetlands that form in small pools and swales as a result of a subsurface hardpan or claypan that inhibits the downward percolation of water. The landscape conditions usually consist of relatively level areas (e.g., mesas) with low hummocks (mima mounds) and shallow basins (vernal pools). The climate consists of cool, wet winters and hot, dry summers. If sufficient rainfall occurs during the rainy season, the combination of landscape position, low soil permeability, and climatic conditions results in water ponding in the pools, that then gradually evaporates and becomes completely dry over the summer and fall. Vernal pools may not fill at all with water during dry years. These highly specialized wetland habitats support a unique flora and are identified by having at least one indicator plant species present (USACE 1997). Several species of rare plants are associated with vernal pools, as are rare invertebrates such as San Diego fairy shrimp (*Branchinecta*



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Vernal Pool in the Western Portion of the AMP Area



Snowy Egret (*Aegretta thula*) in the Northern Portion of the AMP Area

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sandiegensis) and Riverside fairy shrimp (*Streptocephalus woottoni*). Over 300 vernal pools are mapped in the northern and eastern portions of the AMP area.

Southern Willow Scrub (including disturbed)

Southern willow scrub consists of dense, broadleaved, winter-deciduous stands of trees dominated by shrubby willows (*Salix* spp.) in association with mule fat (*Baccharis salicifolia*). This habitat typically occurs on loose, sandy, or fine gravelly alluvium deposited near stream channels during flood flows. Arroyo willow (*Salix lasiolepis*) is the dominant species present in this habitat on site, which occurs in association with a channel in the southeastern portion of the site. A total of approximately 1.17 acres of southern willow scrub was mapped on site (including approximately 1.01 acres of disturbed southern willow scrub).

Disturbed Wetland

Disturbed wetland is dominated by exotic wetland species that invade areas that have been previously altered or undergone periodic disturbances. These non-natives become established more readily following natural or human-induced habitat disturbance than the native wetland flora. Characteristic species of disturbed wetlands include giant reed (*Arundo donax*) and tamarisk (*Tamarix* sp.).

Disturbed wetland on site is composed of tamarisk, pampas grass (*Cortaderia* sp.), curly dock (*Rumex crispus*), and castor-bean (*Ricinus communis*). This habitat occurs as two narrow reaches in the eastern portion of the site, totaling approximately 0.46 acre.

Sensitive Upland Communities

Upland vegetation communities are found in dry landforms and do not occur in wetland situations (e.g., inundated or containing saturated soils). In the AMP area, upland vegetation communities/land cover types include Diegan coastal sage scrub (including disturbed), baccharis scrub (including disturbed), chamise chaparral, non-native grassland, eucalyptus woodland, non-native vegetation, disturbed habitat, and urban/developed land. These individual upland vegetation communities/land cover types and their locations within the AMP area are described below.

Diegan Coastal Sage Scrub

Coastal sage scrub and chaparral are the two major shrub types that occur in southern California, occupying xeric sites characterized by shallow soils. Four distinct coastal sage scrub geographical associations (northern, central, Venturan, and Diegan) are recognized along the California coast. Diegan coastal sage scrub may be dominated by a variety of species depending upon soil type, slope, and aspect. Species typically found within Diegan coastal sage scrub include California sagebrush, California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), lemonadeberry (*Rhus integrifolia*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera*). Disturbed Diegan coastal sage scrub contains many of the same shrub species as undisturbed Diegan coastal sage scrub, but is sparser and has a higher proportion of non-native, annual species.

Diegan coastal sage scrub on site is dominated by California sagebrush, California buckwheat, and deerweed (*Acmispon glaber*). Diegan coastal sage scrub occurs in the eastern and northeastern

portions of the site. A total of approximately 97.8 acres of Diegan coastal sage scrub (including approximately 37.0 acres of disturbed sage scrub), located in the eastern half of the AMP, was mapped on site.

Baccharis Scrub

Baccharis scrub is an upland community recognized by resources agencies as a subtype of coastal sage scrub that develops under a variety of circumstances following Diegan coastal sage scrub disturbance. This vegetation community is dominated by broom baccharis (*Baccharis sarothroides*) and is confined to the site's southeastern corner. A total of approximately 11.2 acres of baccharis scrub (including approximately 9.4 acres of disturbed baccharis scrub), located in the easternmost portion of the AMP area, was mapped on site.

Chamise Chaparral

Chamise chaparral is the most widely distributed chaparral subtype and is dominated by the species chamise (*Adenostoma fasciculatum*). This vegetation community is found from Baja to northern California in pure or mixed stands. It often dominates at low elevations and on xeric south-facing slopes with 60-90 percent canopy cover. Along its lower elevation limit, chamise chaparral intergrades with coastal sage scrub (Rundel 1986). Mission manzanita and black sage are other plant species often associated within this vegetation community.

Characteristic species within this habitat on site include chamise, laurel sumac, and toyon (*Heteromeles arbutifolia*). This habitat occurs as small, scattered stands within and adjacent to sage scrub in the eastern portion of the area, totaling approximately 5.4 acres.

Non-Native Grassland

Non-native grassland is a dense to sparse cover of annual grasses, sometimes associated with numerous species of native annual forbs. This association occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species include oats (*Avena* sp.), red brome (*Bromus rubens*), ripgut (*B. diandrus*), barley (*Hordeum* sp.), and mustard (*Brassica* sp.). Most of the annual introduced species that comprise the majority of species and biomass within the non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California.

Characteristic species found in this habitat on site include oats and red brome. Non-native grassland is widespread in the northern and central portions of the AMP area, occupying a total of approximately 155.5 acres of the area.

Eucalyptus Woodland

Eucalyptus woodland is dominated by eucalyptus (*Eucalyptus* sp.), an introduced genus that produces a large amount of leaf and bark litter. The chemical and physical characteristics of this litter limit the ability of other species to grow in the understory, and floristic diversity decreases. If sufficient moisture is available, eucalyptus becomes naturalized and is able to reproduce and expand its range.

Eucalyptus woodland mapped within the AMP area consists of two small stands of eucalyptus trees along the perimeter of the airport, totaling approximately 0.5 acre.

Non-Native Vegetation

Non-native vegetation is a category describing stands of naturalized trees and shrubs (e.g., acacia [*Acacia* sp.], peppertree [*Schinus* sp.]), many of which are also used in landscaping. Within the AMP area, this habitat consists of a single small stand of acacia in the eastern portion of the area, totaling approximately 0.2 acre.

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present animal usage that removes any capability of providing viable habitat.

Disturbed habitat within the AMP area includes such species as garland daisy (*Glebionis coronaria*), telegraph weed (*Heterotheca grandiflora*), filaree (*Erodium* sp.), and Australian saltbush (*Atriplex semibaccata*). It primarily occurs adjacent to existing taxiways, runways, and other developed lands within the AMP area, totaling approximately 48.3 acres.

Developed

Urban/developed land includes areas that have been constructed upon or otherwise covered with a permanent, unnatural surface and may include, for example, structures, pavement, irrigated landscaping, or hardscape to the extent that no natural land is evident. These areas no longer support native or naturalized vegetation. Developed portions of the site consist of existing taxiways, runways, paved parking areas, and airfield buildings. A total of approximately 157.5 acres of urban/developed land occurs within the AMP area.

2.5.2.2 Jurisdictional Resources

The AMP area supports sites that could be considered jurisdictional waters or wetlands potentially subject to the regulatory jurisdiction of the USACE pursuant to Section 404 of the CWA (33 United States Code [USC] 1344), the RWQCB pursuant to Section 401 of the CWA and/or the State Porter-Cologne Water Quality Control Act, and the CDFW pursuant to Sections 1600 et seq. of the CFG Code, or that may be considered City-defined wetlands under the City's Environmentally Sensitive Lands (ESL) ordinance. These include vernal pools, southern willow scrub, and disturbed wetland, as well as potential non-wetland waters of the U.S./stream channel. Surveys to delineate jurisdictional resources have only been conducted within portions of the airport property (e.g. RECON 2008). Future projects with the potential to impact wetlands and/or waters may require site-specific jurisdictional delineations to define the type and extent of jurisdictional areas within the action area. Only the USACE, RWQCB, and CDFW can make a final determination of jurisdictional boundaries.

2.5.2.3 Sensitive Plants

Sensitive plant species are those that are considered federal, state, or California Native Plant Society (CNPS) rare, threatened, or endangered; MSCP or VPHCP Covered Species; or MSCP Narrow Endemic (NE) species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per the SDMC (Chapter 11, Article 3, Division 1):

- a. A species or subspecies is listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- b. A species is a Narrow Endemic as listed in the Biology Guidelines in the Land Development Manual (City 2018); and/or
- c. A species is an MSCP Covered Species as listed in the Biology Guidelines in the Land Development Manual (City 2018).

A plant species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants. Sensitive plant status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread but exist naturally in small populations.

Three federally and/or state listed plant species have been recorded within the AMP area, including San Diego button-celery (*Eryngium aristulatum* var. *parishii*), San Diego mesa mint (*Pogogyne abramsii*), and spreading navarretia (*Navarretia fossalis*); however, San Diego button-celery and spreading navarretia may no longer be extant within the AMP area. Five other sensitive plant species have been recorded on site, including coast barrel cactus (*Ferocactus viridescens*), Nuttall's scrub oak (*Quercus dumosa*), Orcutt's brodiaea (*Brodiaea orcuttii*), San Diego goldenstar (*Bloomeria clevelandii*), and graceful tarplant (*Holocarpha virgata* ssp. *elongata*). These eight species, along with their respective listing, distributions, habitats, and presence within the AMP area, are shown in Table 2-16, *Sensitive Plant Species Within the AMP area*.

Table 2-16
SENSITIVE PLANT SPECIES WITHIN THE AMP AREA

Species	Listing	Distribution	Habitat	Presence Within AMP area
San Diego Button-celery (<i>Eryngium aristulatum</i> var. <i>parishii</i>)	FE/SE; CRPR 1B.1; City MSCP Narrow Endemic	San Diego and Riverside counties; Baja California, Mexico	Vernal pools or mima mound areas with vernal moist conditions.	A single CNDDDB record indicates this species was found in a single pool in the eastern portion of the site in 1979, but species has not been observed again. The City's 2019 VPHCP does not show this species as occurring on site, and it may no longer be extant at this location.
San Diego Mesa Mint (<i>Pogogyne abramsii</i>)	FE/SE; CRPR 1B.1 CA- Endemic; City MSCP Narrow Endemic	Western San Diego County; Baja California, Mexico	Vernal pools in grasslands, chamise chaparral, and coastal sage scrub on mesas.	Species has been documented in several vernal pools in the eastern and northeastern portions of the site (HELIX 2009-2013 and City VPHCP data).
Spreading Navarretia (<i>Navarretia fossalis</i>)	FT; CRPR 1B.1; City MSCP Narrow Endemic	Western Riverside and southwestern San Diego counties as well as northwestern Baja California, Mexico	Vernal pools, vernal swales, or roadside depressions. Population size is strongly correlated with rainfall. Depth of pool appears to be a significant factor as this species is rarely found in shallow pools.	CNDDDB records indicate this species was found in the northeast portion of the site in 1979, however, 1986 surveys of the same pools were negative, and successive surveys also have been negative for this species. The City's 2017 VPHCP does not show this species as occurring on site and it may no longer be extant at this location.
San Diego Barrel Cactus (<i>Ferocactus viridescens</i>)	CRPR 2B.1; City MCSP Covered	San Diego County; Baja California, Mexico	Optimal habitat for this cactus appears to be Diegan coastal sage scrub hillsides, often at the crest of slopes and growing among cobbles. Occasionally found on vernal pool periphery and mima mound topography in Otay Mesa.	Fewer than 10 individuals observed in coastal sage scrub in the eastern portion of the site (P&D Environmental 1998). Population is presumed extant.
Graceful Tarplant (<i>Holocarpha virgata</i> ssp. <i>elongata</i>)	CRPR 4.2; CA Endemic	San Diego, Orange, and Riverside counties	Grasslands on coastal mesas and in foothills	Species is widespread in non-native grassland habitat on site and has been noted during several biological surveys (RECON 2008, Rocks Biological Consulting 2013).

Species	Listing	Distribution	Habitat	Presence Within AMP area
Nuttall's Scrub Oak (<i>Quercus dumosa</i>)	CRPR 1B.1	San Diego, Orange, and Santa Barbara counties in California; Baja California, Mexico	Coastal chaparral and coastal scrub with sandy or clay loam soils	Scattered individuals were observed in Diegan coastal sage scrub and chamise chaparral by HELIX during the June 2017 field reconnaissance, and five individuals were observed in one location in non-native grassland (RECON 2008). Individuals occurring in the grassland habitat are subject to mowing from airport maintenance operations.
Orcutt's Brodiaea (<i>Brodiaea orcuttii</i>)	CRPR 1B.1; City MSCP Covered	Riverside and San Bernardino counties south to Baja California, Mexico	Vernally moist grasslands, mima mound topography, and vernal pool periphery are preferred habitat. Occasionally will grow on streamside embankments in clay soils.	A population of several hundreds of individuals was found within an area west of the runway (RECON 2008), and smaller numbers of this species were documented in discrete locations within and adjacent to several onsite vernal pools (HELIX 2010-2013; Merkel and Associates 2015).
San Diego Goldenstar (<i>Bloomeria clevelandii</i>)	CRPR 1B.1; City MSCP Covered	Southwestern San Diego County; northwestern Baja California, Mexico	Valley grasslands, particularly near mima mound topography or in the vicinity of vernal pools. Clay soils on dry mesas and hillsides in coastal sage scrub or chaparral.	Several small populations (one to 15 individuals) were observed within grassland and sage scrub in the eastern portion of the site (RECON 2008). Additionally, a large population was mapped by City biologists north of Aero Drive in 2024.

CNDDDB = California Natural Diversity Database; CRPR = California Rare Plant Rank; FE = federally endangered; FT = federally threatened; MSCP = Multiple Species Conservation Plan; SE = state endangered; VPHCP = Vernal Pool Habitat Conservation Plan.

2.5.2.4 Sensitive Wildlife

Sensitive animal species are those that are considered federal or State threatened or endangered; MSCP Covered Species; or MSCP NE species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per the SDMC (Chapter 11, Article 3, Division 1):

- a. A species or subspecies is listed as endangered or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- b. A species is a Narrow Endemic as listed in the Biology Guidelines in the Land Development Manual (City 2018); and/or
- c. A species is a MSCP Covered Species as listed in the Biology Guidelines in the Land Development Manual (City 2018).

A species may also be considered sensitive if it is included on the CDFW's Special Animals List as a candidate for federal (FC) or state (SC) listing, state Species of Special Concern, State Watch List species, State Fully Protected species, or federal Bird of Conservation Concern. Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. Additionally, avian nesting is protected by the federal Migratory Bird Treaty Act (MBTA) and CFG Code.

Three federally listed wildlife species and one federal candidate wildlife species have been documented within the AMP area, including the federally listed threatened coastal California gnatcatcher, (*Poliophtila californica californica*), the federally listed endangered San Diego fairy shrimp, (*Branchinecta sandiegonensis*), the federally listed endangered and state listed endangered least Bell's Vireo (*Vireo bellii pusillus*), and the federal candidate western spadefoot (*Spea hammondi*). These three species, along with their respective status, distributions, habitats, and presence within the AMP area, are shown in Table 2-17, *Sensitive Wildlife Species Within the AMP area*.

Twelve other sensitive animal species have been documented within the AMP area, including burrowing owl (BUOW; *Athene cunicularia*), California horned lark (*Eremophila alpestris actia*), Cooper's hawk (*Aster cooperii*), Coronado skink (*Eumeces skiltonianus interparietalis*), loggerhead shrike (*Lanius ludovicianus*), northern harrier (*Circus cyaneus*), orange-throated whiptail (*Aspidoscelis hyperythra*), San Diego desert woodrat (*Neotoma lepida intermedia*), San Diego horned lizard (*Phrynosoma coronatum blainvillii*), sharp-shinned hawk (*Accipiter striatus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), western spadefoot (*Spea hammondi*), and white-tailed kite (*Elanus leucurus*). In addition to these species that have been documented within the AMP area, Crotch's bumble bee (*Bombus crotchii*) has a moderate potential to occur on site. These 13 species, along with their respective status, distributions, habitats, and presence within the AMP area, are shown in Table 2-17.

Table 2-17
SENSITIVE WILDLIFE SPECIES WITHIN THE AMP AREA

Species	Listing	Distribution	Habitat	Presence Within AMP area
Coastal California Gnatcatcher (<i>Polioptila californica californica</i>)	FT/SSC; City MSCP Covered	In San Diego County, occurs throughout coastal lowlands	Coastal sage scrub, coastal bluff scrub, and coastal sage-chaparral scrub	Species was detected in 3 locations within Diegan coastal sage scrub and chamise chaparral in the eastern portion of the site during vernal pool restoration field work conducted in 2010 (HELIX 2010), and one individual was detected in Diegan coastal sage scrub in the eastern portion of the site during HELIX's 2017 site reconnaissance. Species was also observed during wildlife hazard assessment surveys conducted between June 2018 and May 2019 (JE Fuller and City 2020) and in 2020 during focused surveys for the Fire-Rescue Parking Pad Expansion Project (City 2020a).
San Diego Fairy Shrimp (<i>Branchinecta Sandiegonensis</i>)	FE	San Diego County and extreme northern Baja California, Mexico	Seasonally astatic pools which occur in tectonic swales or earth slump basins and other areas of shallow, standing water often in patches of grassland and agriculture interspersed in coastal sage scrub and chaparral	Species has been documented in numerous vernal pools on site from various biological surveys (RECON 2008; HELIX 2010-2016; and City's 2012 vernal pool database [VPHCP 2019]).
Least Bell's Vireo (<i>Vireo bellii pusillus</i>)	FE/SE; BCC	San Diego County and throughout coastal California, ranging to Santa Clara County	Riparian habitat including dense shrubs and small trees	A single male was detected in 2017 at one location near Aero Drive, staying on site for three weeks before avoiding further detection.
Western Spadefoot (<i>Spea hammondi</i>)	FC/SSC	Throughout the Central Valley and San Francisco Bay area south along the coast to northwestern Baja California	Occurs in open coastal sage scrub, chaparral, and grassland, along sandy or gravelly washes, floodplains, alluvial fans, or playas; require temporary pools for breeding and friable soils for burrowing; generally excluded from areas with bullfrogs (<i>Rana</i>	Observed in 1994 in the vicinity of vernal pools in the east central portion of the site (P&D Environmental 1998).

Species	Listing	Distribution	Habitat	Presence Within AMP area
			<i>catesbeiana</i>) or crayfish (<i>Procambarus</i> sp).	
Burrowing Owl (<i>Athene cunicularia</i>)	BCC/SSC (nesting sites and some wintering sites); City MSCP Covered	In San Diego County, occurs in a few scattered sites	Grassland or open scrub habitats	There have been multiple observations of this species on the AMP. In 2022, a bird strike involving a BUOW occurred in October and a BUOW exclusion was conducted within a hangar in January. A single wintering BUOW was observed by MYF operations staff and the City's airport biologist in a broken retaining wall along Montgomery Drive during the 2017-2018 winter season and near the windsock on the airfield in the 2018-2019 winter season (personal communication with City's airport biologist). This species was also detected on site three times during the airport's wildlife hazard assessment surveys conducted between June 2018 and May 2019 (JE Fuller and City 2020). In addition, a single BUOW individual was observed in the southwest portion of the site by RECON in 2007. The owl was observed repeatedly in and adjacent to a burrow during protocol breeding season surveys in 2007 (RECON 2008). No other owls have been observed on site during various biological surveys conducted in 1994, 1996, 2009, 2010, 2011, 2012, 2013, 2016, and 2017 (P&D Environmental 1998; HELIX 2009-2013; HELIX 2016; Rocks Biological 2013; Merkel and Associates 2015).
California Horned Lark (<i>Eremophila alpestris actia</i>)	WL	Observed year-round scattered throughout San Diego County	Coastal strand, arid grasslands, and sandy desert floors	Multiple observations of this species occurred during wildlife hazard assessment surveys conducted between June 2018 and May 2019 (JE Fuller and City 2020). Species also was observed on site in 1994 (P&D Environmental 1998).

Species	Listing	Distribution	Habitat	Presence Within AMP area
Cooper's Hawk (<i>Aster cooperii</i>)	WL; City MSCP Covered	Occurs year-round throughout San Diego County's coastal slope where stands of trees are present	Oak groves, mature riparian woodlands, and eucalyptus stands or other mature forests	Species was observed in eucalyptus trees in the eastern portion of the site during wildlife hazard assessment surveys conducted between June 2018 and May 2019 (JE Fuller and City 2020). In addition, two individuals were observed in eucalyptus trees in the eastern portion of the site in 1996 (P&D Environmental 1998).
Coronado Skink (<i>Eumeces skiltonianus interparietalis</i>)	SSC	Southwestern California from Los Angeles County south into northwestern Baja California, Mexico; also occurs on several islands off the Pacific coast including Los Coronados Islands	Grasslands, coastal sage scrub, open chaparral, oak woodland, and coniferous forests, usually under rocks, leaf litter, logs, debris, or in the shallow burrows it digs (Zeiner et al. 1988)	Observed on site in 1994 (P&D Environmental 1998).
Loggerhead Shrike (<i>Lanius ludovicianus</i>)	BCC/SSC	An uncommon year-round resident observed throughout San Diego County but absent from pinyon woodlands in higher elevations of the Santa Rosa and Vallecito mountains	Grassland, open sage scrub, chaparral, and desert scrub	Observed in chamise chaparral in 1996 (P&D Environmental 1998).
Northern Harrier (<i>Circus cyaneus</i>)	SSC; City MSCP Covered	In San Diego County, distribution primarily scattered throughout lowlands but can also be observed in foothills, mountains, and desert	Open grassland and marsh	Observed on site in 1994 (P&D Environmental 1998).

Species	Listing	Distribution	Habitat	Presence Within AMP area
Orange-throated Whiptail (<i>Aspidoscelis hyperythra</i>)	WL	Southern Orange County and southern San Bernardino County, south through Baja California.	Coastal sage scrub, chaparral, edges of riparian woodlands, and washes. Also found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open, sunny areas, shaded areas, and abundant insect prey base, particularly termites.	Observed in chamise chaparral in 1996 (P&D Environmental 1998).
San Diego Desert Woodrat (<i>Neotoma lepida intermedia</i>)	SSC	Coastal slope of southern California from San Luis Obispo County south into coastal northwestern Baja California, Mexico	Open chaparral and coastal sage scrub, often building large, stick nests in rock outcrops or around clumps of cactus or yucca.	Nests were observed in sage scrub and chaparral in 1996 (P&D Environmental 1998).
San Diego Horned Lizard (<i>Phrynosoma coronatum blainvillii</i>)	SSC, City MSCP Covered	Northern California though coastal southern California into northern Baja California	Coastal sage scrub and open areas in chaparral, oak woodlands, and coniferous forests with sufficient basking sites, adequate scrub cover, and areas of loose soil; require native ants, especially harvester ants (<i>Pogonomyrmex</i> sp.), and are generally excluded from areas invaded by Argentine ants (<i>Linepithema humile</i>).	Observed in coastal sage scrub in the eastern portion of the site in 1996 (P&D Environmental 1998).
Sharp-shinned Hawk (<i>Accipiter striatus</i>)	WL	In San Diego County, has widespread distribution but occurs in small numbers and only during winter	Usually observed in areas with tall trees or other vegetative cover but can be observed in a variety of habitats.	Observed on site in 1994 (P&D Environmental 1998).
Southern California Rufous-crowned Sparrow (<i>Aimophila ruficeps canescens</i>)	WL; City MSCP	Observed throughout coastal lowlands and foothills of San Diego County	Coastal sage scrub and open chaparral as well as shrubby grasslands.	Observed in coastal sage scrub in the eastern portion of the site in 1996 (P&D Environmental 1998).

Species	Listing	Distribution	Habitat	Presence Within AMP area
White-tailed Kite (<i>Elanus leucurus</i>)	FP	Primarily occurs throughout coastal slopes of San Diego County	Riparian woodlands and oak or sycamore groves adjacent to grassland.	Observed on site during wildlife hazard assessment surveys conducted between June 2018 and May 2019 (JE Fuller and City 2020). Also, observed foraging on site in 1994 (P&D Environmental 1998).
Crotch's Bumble Bee (<i>Bombus crotchii</i>)	SC	Ranges across much of California, including the Mediterranean region, Pacific coast, western desert, and adjacent foothills throughout much of the state's southwestern region and north to Redding	Open grasslands and scrub habitats with suitable nectar and pollen sources. It primarily nests underground and forages on a wide variety of flowers, but a short tongue renders it best suited to open flowers with short corollas. In southern California, it is most commonly observed on flowering species in the <i>Asclepias</i> , <i>Astragalus</i> , <i>Chaenactis</i> , <i>Eschscholzia</i> , <i>Lupinus</i> , <i>Phacelia</i> , and <i>Salvia</i> genera.	Surveys for this species have not been conducted in the AMP area, but observations have been reported in the Tierrasanta area east of I-15, with the closest observation located near a finger canyon two miles east of the Airport in 2023, and several observations further east in Mission Trails Regional Park between 2017 and 2024 (iNaturalist 2025). Within the AMP area, this species is most likely to occur in native scrub and grassland habitats within the MHPA, as these areas provide suitable foraging and nesting habitat that is not subject to airfield maintenance activities. The airfield itself has low potential for this species as it comprises suboptimal habitat due to it being dominated by annual grasses and is regularly mowed, which removes the limited nectar resources that may be present.

BCC = Bird of Conservation Concern; FE= federally endangered; FP = federally protected; FT = federally threatened; MSCP = Multiple Species Conservation Program; SC = candidate for state listing; SE = state endangered; SSC = Species of Special Concern; VPHCP = Vernal Pool Habitat Conservation Plan; WL = Watch List.

2.5.2.5 Wildlife Corridor Movement

Wildlife corridors are linear spaces of undeveloped native habitats that connect large natural open space and provide opportunities for wildlife movement either at a regional or local scale. Habitat linkages between wildlife corridors connect isolated blocks of habitat and allow movement or dispersal species over a large scale and the consequent mixing of genes between populations (i.e., gene pool diversity). Wildlife corridors and habitat linkages contribute to species' sustainability by providing access to adjacent habitat areas for dispersal, foraging, and mating. Wildlife movement corridors and linkages are considered sensitive by the City, resource agencies, and conservation groups.

There are no designated regional corridors within or adjacent to the AMP area. The nearest regional corridor extends from west to east via San Clemente Canyon south of SR 52 and then transitions north of SR 52 and continues through MCAS Miramar. Undeveloped portions of the AMP area that support a large vernal pool complex are limited in scope by surrounding existing development, but serve as stepping stones and local links between areas of native habitat and Multi-Habitat Planning Areas (MHPA) in the general vicinity of the airport (e.g., Stonecrest and San Diego River Park open space areas to the south; Mission Trails Regional Park connections to the east; coastal canyons to the west; and MCAS Miramar and Los Peñasquitos Canyon Preserve to the north).

Based on the presence of vernal pools and wetland habitat, the AMP area supports migratory avian wildlife, as well as urban adapted species.

2.5.3 Geology and Soils

2.5.3.1 Geologic Setting

San Diego is located within the western (coastal) portion of the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges encompass an area that roughly extends from the Transverse Ranges and the Los Angeles Basin, south to the Mexican border, and beyond another approximately 800 miles to the tip of Baja California. The geomorphic province varies in width from approximately 30 to 100 miles, most of which is characterized by northwest-trending mountain ranges separated by subparallel fault zones. In general, the Peninsular Ranges are underlain by Jurassic-age metavolcanic and metasedimentary rocks and by Cretaceous-age igneous rocks of the Southern California Batholith. Geologic cover over the basement rocks in the westernmost portion of the province in San Diego County generally consists of Upper Cretaceous-, Tertiary-, and Quaternary-age sedimentary rocks.

2.5.3.2 Soils and Geologic Formations

Geologic and surficial units within the AMP area include artificial fill materials, the Mission Valley Formation, Stadium Conglomerate, and Friars Formation. These units are described below in order of increasing age and their locations in relation to the AMP area are depicted on Figure 2-9, *Geologic Map*.

Artificial Fill

Although there are no mapped limits of artificial fill, manmade fill underlies portions of the AMP area associated with the construction of buildings or infrastructure. These fills are likely compacted.

Very Old Paralic Deposits (Unit 8)

The Unit 8 very old paralic deposits consist of poorly sorted, moderately permeable, well consolidated, poorly to moderately cemented, reddish brown, interfingered strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. These paralic deposits are well consolidated and are typically suitable for light structural or thin fill loads. They are locally cemented and may create difficult excavation conditions for utility trenches or basements. The Unit 8 deposits are mapped across most of the AMP area.

Mission Valley Formation

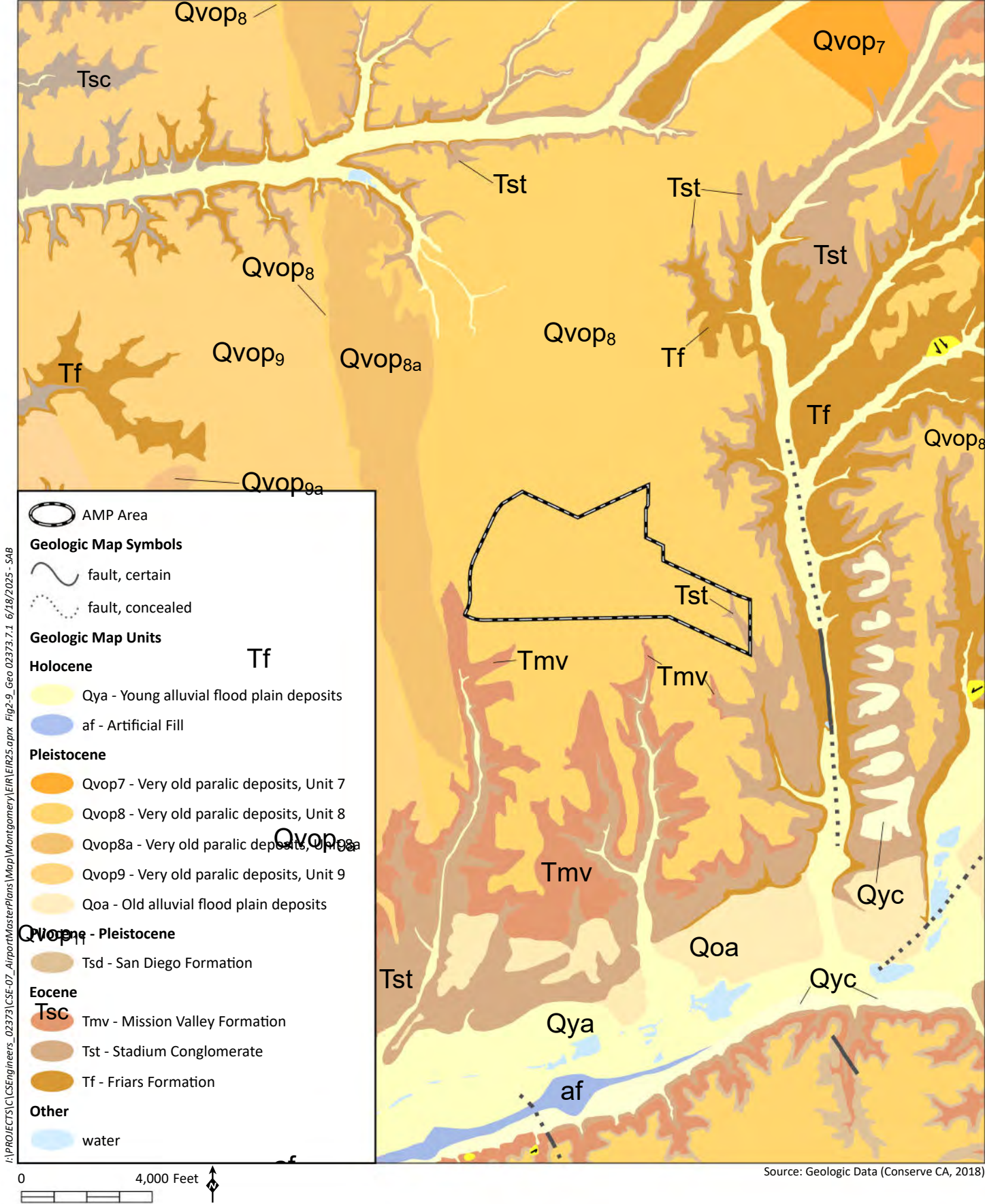
The Mission Valley Formation is only locally preserved in the southwest portion of the AMP area. It is exposed near the top of natural canyon slopes just south of Aero Drive near the I-805 freeway and in Mission Valley, north of Friars Road. It consists predominantly of light olive gray, soft and friable, fine- to medium-grained marine and non-marine sandstone containing cobble conglomerate tongues. The Mission Valley Formation is erodible on slopes. It can typically support light to moderate structural and fill loads.

Stadium Conglomerate

The Stadium Conglomerate underlies the entire AMP area, underlying the very old paralic deposits and, where preserved, the Mission Valley Formation. It is exposed near the southeastern corner of the AMP area. It consists of massive cobble conglomerate with a dark-yellowish-brown, coarse-grained sandstone matrix. The conglomerate contains slightly metamorphosed volcanic and volcanoclastic rocks and quartzite. The conglomerate is very well consolidated and locally very well cemented. The conglomerate can typically support very heavy structural and fill loads. The Stadium Conglomerate is difficult to excavate and is approximately 150 feet thick where it is exposed near the AMP area.

Friars Formation

The Friars Formation consists of yellowish-gray, medium-grained, massive, poorly indurated non-marine and lagoonal sandstone and claystone with tongues of cobble conglomerate. Near the AMP area, it is exposed in the lower portions of the western slopes and bottom of Murphy Canyon. The Friars Formation is well consolidated where un-weathered and can typically support moderate structural and fill loads. In other portions of San Diego, the Friars Formation lagoonal claystone is very susceptible to massive landsliding and surficial slope failures. The Friars Formation near the AMP area is composed predominantly of sandstone and is somewhat more stable as evident by the steeper slopes along Murphy Canyon and a lack of identifiable landslides.



2.5.3.3 Geologic Hazards

Geologic Hazard Categories

The City of San Diego Seismic Safety Study (City 2008) Geologic Hazards and Faults maps document the known and suspected geologic hazards and faults in the region. The maps rate potential hazards by relative risk, on a scale from nominal to high. The Seismic Safety Study is intended as a tool to determine the level of geotechnical review to be required by the City for planning, development, or building permits. Figure 2-10, *Geologic Hazards*, shows the location of hazards as defined by the City maps. The mesa area that covers the AMP area is designated as Geologic Hazard Category 51, which includes other terrain characterized by “level mesas - underlain by terrace deposits or bedrock” with nominal risk and Geologic Hazard Category 52, “other level areas or gently sloping to steep terrain” with favorable geologic structure and low risk.

Faulting and Seismicity

San Diego is affected by the boundary between the North American and Pacific tectonic plates. The boundary in southern California is characterized by a wide zone of predominantly northwest-striking, right-slip faults that span the Imperial Valley and Peninsular Range to the offshore California Continental Borderland Province (from the California continental slope to the coast). Within the San Diego region, this zone extends from the San Clemente fault zone located approximately 60 miles west of San Diego to the San Andreas fault zone approximately 70 miles east of San Diego. The most active faults based on geodetic and seismic data are the San Andreas, San Jacinto, and Imperial faults. These faults take up most of the plate motion. Smaller faults, however, are active enough to create damaging earthquakes and these include the Elsinore, Newport- Inglewood-Rose Canyon, and the offshore Coronado Banks, San Diego Trough, and San Clemente fault zones.

Table 2-18, *Fault Characteristics for Active Faults in the Region*, summarizes the local and regional fault characteristics for the active faults that could affect the AMP area. Active faults are those Quaternary Holocene faults which have been shown to have ruptured in the last 11,000 years. Potentially active faults are those Quaternary Pleistocene faults which have been shown to have ruptured during the last 1.6 million years but not within the last 11,000 years. Potentially active faults have a much lower probability for future activity than active faults. The AMP area is not underlain by active or potentially active faults.

Table 2-18
FAULT CHARACTERISTICS FOR ACTIVE FAULTS IN THE REGION

Fault Zone	Approximate Distance to AMP area (miles)	Slip Rate (mm/yr)	Fault Length (miles)	Estimated Maximum Magnitude (Mw)
Newport – Inglewood – Rose Canyon	4	1.5	130	7.2
Coronado Bank (offshore)	16	3.0	115	7.6
San Diego Trough (offshore)	25	1.5	106	7.5
San Miguel – Vallecitos (Northern Baja California)	34	0.2	100	6.9
Elsinore	36	5.0	190	7.0
San Clemente (offshore)	23		129	7.7

Fault Zone	Approximate Distance to AMP area (miles)	Slip Rate (mm/yr)	Fault Length (miles)	Estimated Maximum Magnitude (Mw)
San Jacinto	57	4.0	152	6.8
Southern San Andreas	84	25	140	7.2

Source: The Bodhi Group 2018

mm = millimeters; yr = year; Mw = maximum moment magnitude

The nearest active fault capable of causing ground rupture and strong earthquake shaking is the Rose Canyon fault zone located approximately four miles southwest of the AMP area. The Rose Canyon fault zone is the southernmost portion of the Newport-Inglewood fault zone which extends from Long Beach in the north to the Descanso fault, offshore of Baja California. A Magnitude 6.3 earthquake occurred on the Newport-Inglewood fault in 1933 and caused serious damage in the Los Angeles area. There have been no historical damaging earthquakes documented on the Rose Canyon fault nor has there been historical fault rupture. Fault trenching on the Rose Canyon fault has shown that the fault has ruptured the ground surface several times in the last 10,000 years.

The nearest potentially active fault to the AMP area is the La Nacion fault zone located approximately five miles to the southeast. This fault zone extends from just west of San Diego State University and southward to the United States/Mexico border. The fault is a normal fault showing down to the west, extensional separations. The fault offsets the lower portion of the early Pleistocene very old paralic deposits in southern San Diego County but shows very little, if any geomorphic features typical of recent fault offset. The fault zone may be a secondary feature resulting from movement on the Rose Canyon fault zone. Based on its length, the fault is estimated to be capable of causing Magnitude 6.7 earthquakes.

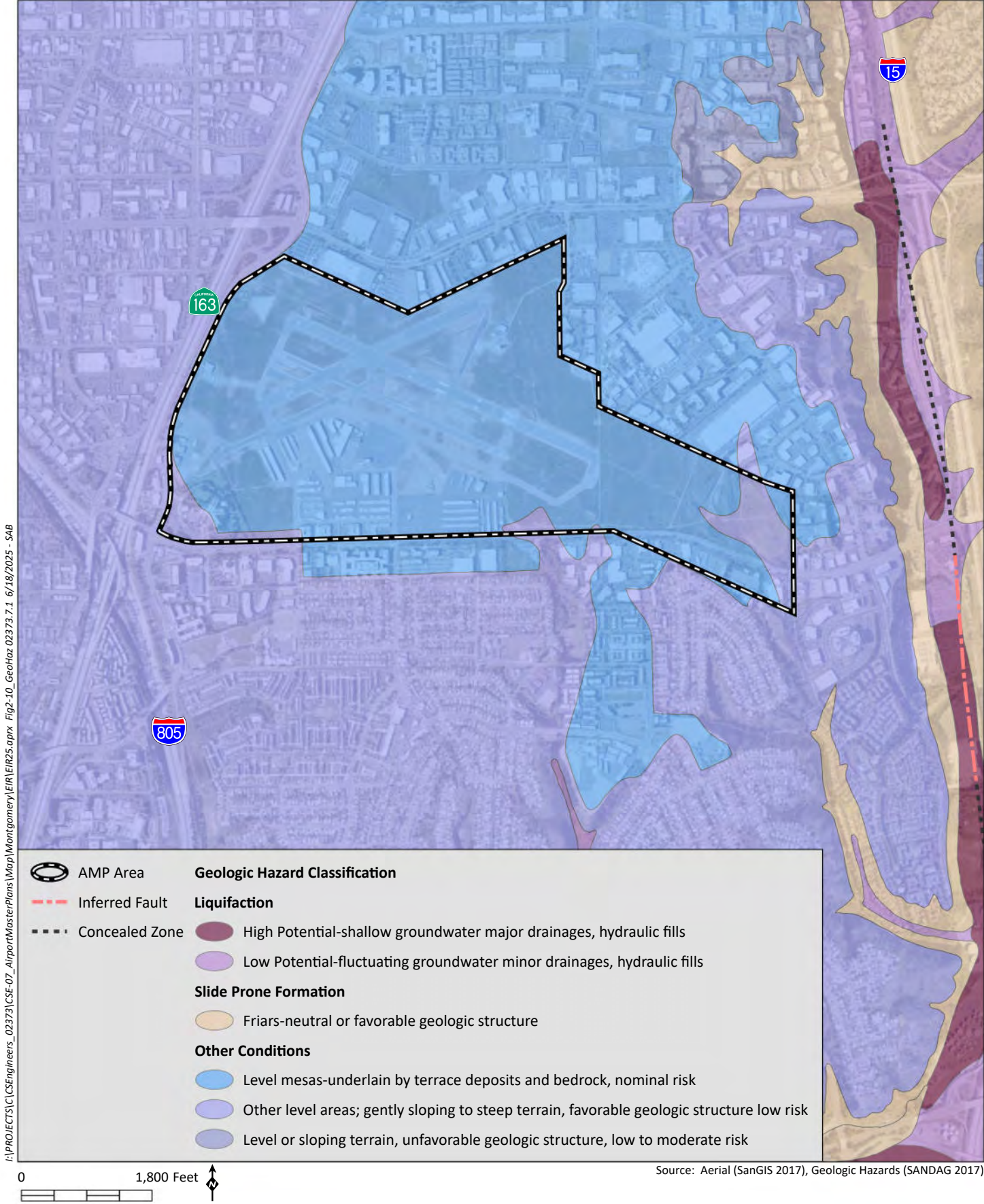
Additionally, the Murphy Canyon fault has been mapped in the bottom of Murphy Canyon (Kennedy and Tan 2008) immediately to the east of the AMP area. The fault is concealed (buried) and approximately located. Evidence for the fault is poorly documented and appears mostly based on linear character of Murphy Canyon and a reported 30-foot vertical offset of the contact between the very old paralic deposits on either side of the canyon. This fault is not considered active or potentially active.

2.5.3.4 Groundwater

Site specific information on groundwater depth is not available. Groundwater levels at a property adjacent to the west of the AMP area were recorded to range from approximately 26.3 to 27.6 feet below ground surface.

2.5.4 Greenhouse Gas Emissions

The AMP area is currently a source of anthropogenic greenhouse gas (GHG) emissions, with emissions generated by aircraft activity and vehicular traffic and by the energy use, water use, and solid waste management practices of the existing development. See additional information below, Section 5.4 of this PEIR, and Appendix D, Greenhouse Gas Emissions Technical Report (HELIX 2025c).



Geologic Hazards

Figure 2-10

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2.5.4.1 Worldwide and National Greenhouse Gas Inventory

In 2020, total anthropogenic GHG emissions worldwide were estimated at 49,800 million metric tons (MMT) of carbon dioxide equivalents (CO₂e) emissions (PBL Netherlands Environmental Assessment Agency 2022). The five largest emitting countries and the European Union (EU-27), together account for about 60 percent of total global GHG emissions: China (27 percent), the United States (12 percent), the European Union (about 7 percent), India (7 percent), the Russian Federation (4.5 percent) and Japan (2.4 percent) (PBL Netherlands Environmental Assessment Agency 2022).

Per USEPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2020, total United States GHG emissions were approximately 5,981 MMT CO₂e in 2020 (USEPA 2022). The primary GHG emitted by human activities in the United States was carbon dioxide (CO₂), which represented approximately 76.4 percent of total GHG emissions (4,760 MMT CO₂e). The largest source of CO₂, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.8 percent of CO₂ emissions in 2018 (5,031.8 MMT CO₂e). Relative to 1990, gross United States GHG emissions in 2020 were lower by 7.3 percent, down from a high of 15.2 percent above 1990 levels in 2007. GHG emissions decreased from 2019 to 2020 by 10.6 percent and overall, net emissions in 2020 were 21.4 percent below 2005 levels (USEPA 2022).

2.5.4.2 Statewide and Regional Greenhouse Gas Emissions

CARB performed statewide inventories for the years 2000 to 2020, as shown in Table 2-19, *California Greenhouse Gas Emissions by Sector*. The inventory is divided into five broad sectors of economic activity: agriculture, commercial and residential, electricity generation, industrial, and transportation. Emissions are quantified in MMT CO₂e.

Table 2-19
CALIFORNIA GREENHOUSE GAS EMISSIONS BY SECTOR
(MMT CO₂e)

Sector	1990	2000	2010	2020
Agriculture and Forestry	18.9 (4%)	31.0 (7%)	33.7 (8%)	31.6 (9%)
Commercial and Residential	44.1 (10%)	45.8 (10%)	52.2 (12%)	38.7 (10%)
Electricity Generation	110.5 (26%)	105.4 (22%)	90.6 (20%)	59.5 (16%)
Industrial	105.3 (24%)	105.8 (22%)	101.8 (23%)	73.3 (20%)
Transportation	150.6 (35%)	183.2 (39%)	170.2 (38%)	135.8 (37%)
Unspecified Remaining	1.3 (<1%)	0.0 (0%)	0.0 (0%)	30.2 (8)
TOTAL	430.7	471.1	448.5	369.1

Source: CARB 2007 and 2025d

As shown in Table 2-19, statewide GHG source emissions totaled 430.7 MMT CO₂e in 1990, 471.1 MMT CO₂e in 2000, 448.5 MMT CO₂e in 2010, and 369.1 MMT CO₂e in 2020. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. A San Diego regional emissions inventory was prepared by the University of San Diego School of Law Energy Policy Initiative Center that took into account the unique characteristics of the region. Their 2014 emissions inventory for San Diego is shown below in Table 2-20, *San Diego County Greenhouse Gas Emissions by Sector*. The sectors included in this inventory are somewhat different from those in the statewide inventory. Similar to the statewide emissions,

transportation related GHG emissions contributed the most countywide, followed by emissions associated with energy use.

Table 2-20
SAN DIEGO COUNTY GREENHOUSE GAS EMISSIONS BY SECTOR
(MMT CO₂e)

Sector	2014
On-Road Transportation	1.46 (45%)
Electricity	0.76 (24%)
Solid Waste	0.34 (11%)
Natural Gas Consumption	0.29 (9%)
Agriculture	0.16 (5%)
Water	0.13 (4%)
Off-Road Transportation	0.04 (1%)
Wastewater	0.02 (1%)
Propane	0.01 (<0.5%)
TOTAL	3.21

Source: County 2014; MMT = million metric tons; CO₂e = carbon dioxide equivalent

2.5.4.3 City-wide Greenhouse Gas Emissions

According to the City's 2020 Climate Action Plan Annual Report (City 2020b), the total GHG emissions from the City in 2019 was approximately 9.6 MMT CO₂e. In 2019, some increase was seen in natural gas consumption and wastewater production but was offset by a decrease in GHG emissions from electricity consumption, transportation, solid waste and water use.

2.5.5 Historical, Archeological, and Tribal Cultural Resources

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of historic buildings, structures, objects, or sites, prehistoric and archaeological resources, sacred sites and human remains, and tribal cultural resources determined to be significant or potentially significant under CEQA. See additional information below, Section 5.5 of this PEIR, and Appendix E, Historical Resources Technical Report (IS Architecture 2019).

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures. See additional information below, Section 5.5 of this PEIR, and Appendix F, Archaeological Resource Management Report.

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place or object, which is of cultural value to a Tribe, and is either on or eligible for listing in the national, state, or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a Tribal Cultural Resource (PRC Section 21074).

2.5.5.1 Historical Setting

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

Spanish Period

While Juan Rodriguez Cabrillo visited San Diego briefly in 1542, the beginning of the historic period in the San Diego area is generally given as 1769, the year that the Royal Presidio of San Diego was founded on a hill overlooking the San Diego River. A small pueblo, now known as Old Town San Diego, developed below the presidio. The Mission San Diego de Alcalá was constructed in its current location five years later. The Spanish period was characterized by religious and military institutions bringing Spanish culture to the area and attempting to convert the Native American population to Christianity. The economy of Alta California during this period was based on cattle ranching at the missions; a minor amount of agriculture and commerce took place in and around San Diego.

Mexican Period

Mexico, including Alta California, gained its independence from Spain in 1821, but Spanish culture and influence remained as the missions continued to operate as they had in the past, and laws governing the distribution of land were also retained for a period of time. Following secularization of the missions in 1834, large ranchos were granted to prominent and well-connected individuals and the society made a transition from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. With numerous new ranchos, cattle ranching expanded and prevailed over agricultural activities. These ranches put new pressures on California's native populations, as grants were made for inland areas still occupied by the Kumeyaay, forcing them to acculturate or relocate farther into the back country.

American Period

The Mexican period ended when Mexico ceded California to the United States after the Mexican-American War (1846–1848), which concluded with the Treaty of Guadalupe Hidalgo. A great influx of settlers to California and the San Diego region occurred during the American Period, resulting from several factors including the discovery of gold in the state in 1849, the end of the Civil War, the availability of free land through passage of the Homestead Act, and later, the importance of San Diego County as an agricultural area supported by roads, irrigation systems, and connecting railways. The increase in American and European populations quickly overwhelmed many of the Spanish and Mexican cultural traditions.

The 1880s saw “boom and bust” cycles that brought thousands of people to the area of San Diego County. By the end of the decade, many had left, although some remained to form the foundations of small communities based on dry farming, orchards, dairies, and livestock ranching. During the late 19th and early 20th centuries, rural areas of San Diego County developed small agricultural communities centered on one-room schoolhouses.

By the 1890s, the City entered a time of steady growth and subdivisions such as Golden Hill, Sherman Heights, Logan Heights, Banker's Hill, and University Heights were developed. As the City continued to grow in the early 20th century, the downtown's residential character changed. Streetcars and the introduction of the automobile allowed people to live farther from their downtown jobs and new suburbs were developed. The influence of military development, beginning in 1916 and 1917 during World War I, resulted in substantial development in infrastructure and industry to support the military and accommodate soldiers, sailors, and defense industry workers. In the post-World War II years, San Diego grew significantly, with new jobs created in the aircraft industry, shipbuilding, fishing, and other enterprises.

Montgomery-Gibbs Executive Airport Historical Context

The Montgomery-Gibbs Executive Airport, originally known as Gibbs Field, was opened by William "Bill" Gibbs, Jr. in 1937. During this time, the project area and surrounding vicinity, which would later become known as the community of Kearny Mesa, was completely undeveloped land covered in sage brush and other chaparral vegetation. After clearing the previously undeveloped land for two dirt runways, Gibbs Field served as an airfield for a small group of private aviators and a training ground for flight schools.

In 1940, the airport was leased to Ryan Aeronautical Co., who expanded and upgraded the field for use as a training ground for its flight school. Civilian aviation was prohibited after the start of World War II and Bill Gibbs was forced to relocate his operation to Arizona. Gibbs returned to his airport after the war and, between 1947 and 1950, constructed the three hangars known as Buildings 6, 7, and 8, which as discussed in Section 5.5 of this PEIR, are historic structures (see Figures 2-11, *Historic Resources*, and 2-12, *Historic Hangars, Buildings 6, 7, 8*). It was also in 1947 that the City of San Diego acquired the airport from Gibbs, who was granted a lease to continue operating his business on site. Shortly thereafter, Gibbs Field was annexed by the City and a large expansion project was undertaken to update the airport. This undertaking included the re-centering of the airport, paving the runways, and the erection of new buildings and hangars. New infrastructure improvements surrounding the airport around the same time included the development of U.S. 395 and the Cabrillo Freeway (both now making up SR 163) and other roads like Aero Drive, West Aero Way and East Aero Way (now Glenn H. Curtiss Road and John J. Montgomery Drive, respectively).

The airport was renamed Montgomery Field in 1950 following the City's redevelopment of the airport. Although the City had initially intended the airport to serve as its only private flying field, by the mid- 1950s Montgomery Field was being seriously considered as the city's major airport of the future. This plan was opposed by the Navy due to the close proximity of Montgomery Field and Miramar Naval Air Station and was no longer considered as a major airport by 1960. An upgrade to the airport was deemed necessary, and a master plan recommending further development was approved in the mid-1960s. As a result of this, a modern control tower was built in 1965. Further construction of administration buildings and large-scale paving including the runways, taxiways, and new spaces for aircraft and automobile parking followed shortly thereafter. Private aviation continued to grow in popularity during the 1970s and Montgomery Field became one of the busiest airports in the nation. Much needed improvements and system updates occurred in the late-1970s and included the installation of a modern instrument landing system.

By the mid-1950s the area that would become the community of Kearny Mesa was predominantly zoned for light-industrial due to the use and height restrictions that existed around Montgomery



Figure 1. Project Area/Area of Potential Effect. *Google Maps.*
2



Figure 3. The three hangars evaluated in this report. *Google Maps.*

Source: IS Architecture 2019

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Building 6



Building 7



Building 8

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Field and Miramar Naval Air Station. This further enticed major aircraft, aeronautical and defense-related companies to the area. Some of the major companies to relocate to Kearny Mesa during the 1950s included Ryan Aeronautical Co., Consolidated Aircraft Corp., General Dynamics, and Rohr Aircraft Corp. Other, more diversified, companies included Cubic Corp, a large electronics research company.

The residential development that was forced outside of the airfield safety zones surrounded Kearny Mesa to the south and east. As is shown in a 1964 aerial photograph, these areas, which made up the communities of Serra Mesa and Clairemont, had been nearly built out by that time. Industrial development followed suit and by 1969 most of the available industrial land in Kearny Mesa was occupied. While industrial development never fully ended, the declining availability of large tracts in the area had caused it to slow in the late 1960s. The availability of smaller parcels, however, resulted in explosive commercial, retail, and office development in the 1970s and 1980s. The entire community of Kearny Mesa had been effectively built out by 1989.

2.5.5.2 Prehistoric and Historic Archaeological Resources Setting

The earliest well-documented sites in the San Diego area belong to the San Dieguito Tradition, dating to over 9,000 years ago. The San Dieguito Tradition is thought by most researchers to have an emphasis on big game hunting and coastal resources. Diagnostic material culture associated with the San Dieguito complex includes scrapers, scraper planes, choppers, large blades, and large projectile points.

The San Dieguito complex is followed by the Archaic Period, dating from at least 7,000 years ago. The local cultural manifestation of the Archaic period is called the La Jolla complex along the southern coastal region and brings a shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. Sites dating to the Archaic Period are numerous along the coast, near-coastal valleys, and around estuaries. The La Jolla complex tool assemblage is dominated by rough cobble tools, especially choppers and scrapers, but also includes manos and metates, biface points, and bone tools. Sites within the La Jolla complex typically include shell middens, terrestrial and marine mammal remains, beads, and flexed burials.

While there has been considerable debate about whether San Dieguito and La Jolla patterns might represent the same people using different environments and subsistence techniques, or whether they are separate cultural patterns, abrupt shifts in subsistence and new tool technologies occur at the onset of the Late Prehistoric Period, approximately 1,300-1,500 years ago. Within the City of San Diego, the Late Prehistoric period is represented by the Cuyamaca complex (Yuman forebears of the Kumeyaay) and is characterized by higher population densities and intensification of social, political, and technological systems. Elements of the Cuyamaca complex include small, pressure-flaked projectile points (Desert Side-notched and Cottonwood Triangular series); milling implements (manos, metates, mortars, and pestles); Tizon Brownware pottery; various cobble-based tools (e.g., scrapers, choppers, and hammerstones); arrow shaft straighteners; pendants; Olivella shell beads; pictographs; and cremations. Subsistence is thought to be focused on the utilization of acorns and grass seeds, with small game serving as a primary protein resource and big game as a secondary resource. Fish and shellfish were also secondary resources, except immediately adjacent to the coast, where they assumed primary importance. The settlement system is characterized by seasonal villages where people used a central-based collecting subsistence strategy.

2.5.5.3 Tribal Cultural Resources Setting

The AMP area is within the traditional territory of the Kumeyaay people, also known as Ipai, Tipai, or Diegueño (named for Mission San Diego de Alcalá). At the time of Spanish contact, Yuman-speaking Kumeyaay bands occupied southern San Diego and southwestern Imperial counties and northern Baja California. The Kumeyaay lived in semi-sedentary villages, or rancherías, with some rancherías containing more than one clan. Kumeyaay villages were located in river valleys with access to water and boulder outcrops and along the shoreline of coastal estuaries. Prior to Spanish Colonization in the 1700s, Native American aboriginal lifeways continued to exist, and it is likely that the Kumeyaay used Murphy Canyon as a travel corridor between villages along the San Diego River, including Nipaguay at the location of the San Diego Mission de Alcalá, less than a half-mile to the southeast of Kearny Mesa. Although Kearny Mesa was undoubtedly utilized by the Kumeyaay for foraging and as a travel route, no known villages or major settlements are recorded there, and very little ethnographic data exists for the mesa area. The Kumeyaay are the Most Likely Descendants (MLDs) for Native American human remains found in the City.

2.5.6 Human Health, Public Safety, and Hazardous Materials

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed.

2.5.6.1 Types of Hazardous Chemicals and Exposure Pathways

Past and present land uses at the Airport and surrounding properties, including industrial use waste storage and disposal, may have resulted in releases of hazardous chemicals to the environment. In addition, spills and leaks of fuel from locations where fuel was stored and dispensed could have affected the subsurface. Releases of hazardous substances along transportation corridors and deterioration of building materials that contained hazardous chemicals could also have affected the environment.

Past releases of these hazardous chemicals can leave residual contamination in soil, soil vapor, and groundwater within the AMP area. These chemicals are classified based on their properties, persistence in the environment, and general adverse effects, as described below.

Total Petroleum Hydrocarbons

Total petroleum hydrocarbons (TPH) is a term used to describe a large family of chemical compounds that originate from crude oil and are used to make petroleum and other industrial products. Benzene, toluene, ethylbenzene, naphthalene, and xylenes are part of the more volatile fractions of TPH (gasoline mixture) and polynuclear aromatic hydrocarbons (e.g., benzo(a)pyrene) are part of the less volatile fractions (diesel and heavier mixtures). Both groups, VOCs and fractions that are non-volatile, can have adverse health effects based on the type of chemical, routes of exposure (inhalation, direct contact, ingestion), and the mass of chemical available for exposure.

Relative to other classes of hazardous substances, petroleum hydrocarbons degrade in aerobic conditions (in the presence of oxygen). If present in significant quantities in groundwater, TPH can exist in its own phase (as product) and will float on the surface of the water table (USEPA 2012).

The most common pathways for exposure to the volatile fraction of TPH is inhalation, followed by direct contact (if the pathways of exposure are complete). The most common pathway of exposure to the non-volatile fractions of TPH is direct contact. The inhalation exposure pathway to the non-volatile fraction is incomplete (with the exception of TPH-impacted dust particles that can be inhaled in areas of soil disturbance).

Chlorinated Volatile Organic Compounds

Chlorinated volatile organic compounds (CVOCs) were commonly used for cleaning and degreasing and were associated with dry cleaning, manufacturing, and automobile maintenance at former military facilities. Some common CVOCs that can be found in the environment are tetrachloroethylene (PCE), trichloroethylene (TCE), and their breakdown products, such as cis-1,2-dichloroethene, trans-1,2-dichloroethene, and vinyl chloride. Exposure to CVOCs can result in adverse health effects. CVOCs are generally more persistent and can remain in the environment (soil, groundwater, soil vapor) for extended periods of time. CVOCs can migrate into indoor air from soil vapor and result in adverse health effects from inhalation exposure (USEPA 2012).

Lead

Lead is a heavy metal with multiple industrial and other applications. Exposed shallow soil may have been contaminated with aerally deposited lead (ADL) along well-traveled transportation road corridors, aircraft runways, and taxiways, and along the aircraft flight paths, prior to the phasing out of leaded gasoline in the late 1970s. The ADL is caused by historical emissions from vehicle and aircraft exhausts (tetraethyl lead was mixed with gasoline from the 1920s to the 1970s as an anti-knock agent).

Lead-based paint (LBP) can be found on structures built before 1978 (when it was banned in paint). Deteriorating LBP can contaminate shallow soil around the structures. Soil contaminated lead (e.g., from ADL and LBP), when disturbed, can become airborne in dust. Exposure to lead, either through direct contact, inhalation of dust containing lead, or through ingestion (can be a problem in younger children who may ingest deteriorating LBP or soil contaminated with lead) at significant concentrations can result in adverse health effects (lead is a known neurotoxin).

Other Metals

Metals can be found in manufacturing and industrial facilities and landfills (e.g., arsenic, chromium, mercury, and copper). Although metals can be naturally occurring, in higher concentrations they can be toxic to human health. If released to the environment in significant quantities, metals are more likely to be present in shallow soil. Exposure to metals in soil can occur through direct contact and inhalation of dust containing metals. Some chemicals used in industrial processes, such as hexavalent chromium can contaminate groundwater and threaten drinking water sources.

Emerging Chemicals of Concern

Emerging chemicals of concern (ECC) include a wide array of potential pollutants, such as pharmaceuticals, personal care products, per-and polyfluoroalkyl substances (PFAS), surfactants, microorganisms, microplastics, and endocrine disrupting chemicals, among others. These unregulated contaminants can occur in wastewater, reused water, drinking water or other matrices and there is often an incomplete understanding of the risk posed by these potential pollutants. Often ECCs are difficult to measure and can be linked to many current and historic sources (USEPA 2024). Areas within the AMP area may contain ECCs, especially where firefighting foams and suppressants have been used (firefighting training areas, aircraft or vehicle crashes, or other areas where fires occurred) or stored. Cases under regulatory oversight may not have been tested for ECCs. ECCs may be present in the subsurface and can be harmful to human health through ingestion, direct contact, and by inhalation.

Asbestos

Asbestos is a fibrous mineral that occurs naturally in rock and soil (USEPA 2023a). It has been used in a wide variety of building materials such as insulation, roofing materials, and tiles. It has also been commonly used in automobile parts such as brakes and transmissions. Asbestos is likely present in structures within the AMP area and may be present in shallow soil near buildings and near busy right-of-way corridors. The most common route of exposure is through inhalation of tiny particles of deteriorated (friable) asbestos containing materials (ACMs). Exposure to asbestos is harmful to human health.

Pesticides

Pesticides are chemicals used primarily for agricultural purposes. Pesticides are commonly found in shallow soil in areas where agricultural use is or was historically present. Pesticides are potentially harmful to human health through direct contact and inhalation. Based on a review of historical documents, the AMP area does not appear to have been historically used for agriculture. However, the Airport does currently use pesticides to control vegetation growth in the runway and taxiway safety areas.

Polychlorinated Biphenyls

Polychlorinated Biphenyls (PCBs) belong to a broad family of man-made organic chemicals and were manufactured from 1929 to 1979 (when manufacturing was banned). PCBs are chemically stable and have a high boiling point and electrical insulation, and because of these properties, were used in a wide range of industrial and commercial applications. PCBs were commonly used in electrical and hydraulic equipment, as a plasticizer in paints, plastics and rubber manufacturing, and may be found in transformers and capacitors, electrical equipment, hydraulic systems, fluorescent light ballasts, cable installation, oil-based paint, plastics caulking, adhesives, and floor finishes (USEPA 2023b). Even though they are no longer manufactured, PCBs can be released into the environment from past applications, and from the disposal or storage of PCBs wastes. The USEPA, International Agency for Research on Cancer, and the National Toxicology Program have concluded that PCBs are a probable human carcinogen (USEPA 2023b). If released to the environment, PCBs are more likely to be in soil (relative to other media) and building materials and can be harmful to human health through ingestion and direct contact.

2.5.6.2 Hazardous Materials Sites

A search of federal, state, and local environmental regulatory agency databases was conducted to identify sites within the AMP area that may have been impacted by hazardous materials or wastes. Ten properties within the AMP area and two off-site properties were found to be of potential environmental concern. These 12 sites are described below and identified on Figure 2-13, *Areas of Environmental Concern*. For additional information, see Section 5.6 of this PEIR and Appendix F, Hazardous Materials Technical Study (The Bodhi Group 2019).

On-Site Properties of Potential Concern

San Diego City Police Department, Air Support Unit/Gibbs Flying Service (3750 John J. Montgomery Drive)

These two properties are located in the western portion of the AMP area, at a site where two 10,000-gallon aviation fuel underground storage tanks (USTs) and one 50-gallon unleaded gasoline UST were removed between 1988 and 1991. Records indicate two unauthorized release cases (H21291-001 and -002) at the site associated with TPH-contaminated soils present following removal of the USTs. Both cases were closed for the facility uses at that time (airplane parking and commercial use) and the subsurface conditions are to be reevaluated if the land uses change. The site is also associated with multiple permits for storage of and disposal of hazardous wastes including hydrocarbons, jet fuel, cleaners and solvents, waste oil, asbestos, and propane. Investigation reports on file with County Department of Environmental Health (DEH) and RWQCB indicate violations observed were minor and related to bookkeeping. Storm water reports and Industrial Inspection Reports from 1994 through 2017 indicated that the facilities were generally in compliance with Best Management Practices (BMPs) and hazardous material storage, with the exception of a sheen occasionally observed in parking areas and fuel trucks observed not parking on secondary containment in 2017.

Former Gibbs Service Center/Flying R. Aviation/Armed Forces Aero C (8906 Aero Drive)

The former Gibbs Service Center, which was located in the southern portion of the AMP area, is listed as an active gasoline service station from 1985 to 2007. The site was also associated with a closed unauthorized release case (H21283-001) for a release discovered during removal of a UST in 1986. The release affected soil only and was closed the same year. The site is also listed for storage and disposal waste oils and oil filters, solvents, parts washers, liquids with chromium VI, and compressed gases; while there was a reported violation of the active permit, the cause was due to an inadequate site map in their Hazardous Materials Business Plan and not related to a hazardous material release. Gibbs Service Center is listed on the UST database with active permits for operation of two 12,000-gallon aviation fuel USTs, one 2,000-gallon unleaded fuel UST, and one 2,000-gallon diesel UST; however, these USTs have been removed from the site.

Montgomery Demolition Closed Landfill (3750 John J. Montgomery Drive)

This facility is a closed solid waste disposal site that is inspected annually. Violations were not noted in the inspection reports and no enforcement actions were on file for the landfill.

Spiders Aircraft Service Incorporated (3873 Kearny Villa Road)

This facility is located along the western boundary of the AMP area and is listed on the UST database with an active permit for a 250-gallon waste oil UST, and an inactive permit for a 550-gallon UST containing solvents that was removed in 1986.

National Air College/Texaco (3760 Glen H. Curtiss Road)

Two 10,000-gallon USTs were removed from this site in 1993, and soils impacted by the USTs were excavated, stockpiled, and then backfilled. An estimated 300 to 400 cubic yards of TPH-impacted soil remain at the locations of the former USTs. The case associated with the USTs was closed in 1998 for the facility use at the time (aircraft storage and maintenance) and groundwater was not believed to be at risk from contamination. The site occupant was also listed for use and disposal of waste oil, used batteries, hydrocarbon solvents, and used oil filters; however, associated violations were minor and are not an environmental concern at this time.

Crown Air/Mercy Air/Critical Air (3717 and 3753 John J. Montgomery Drive)

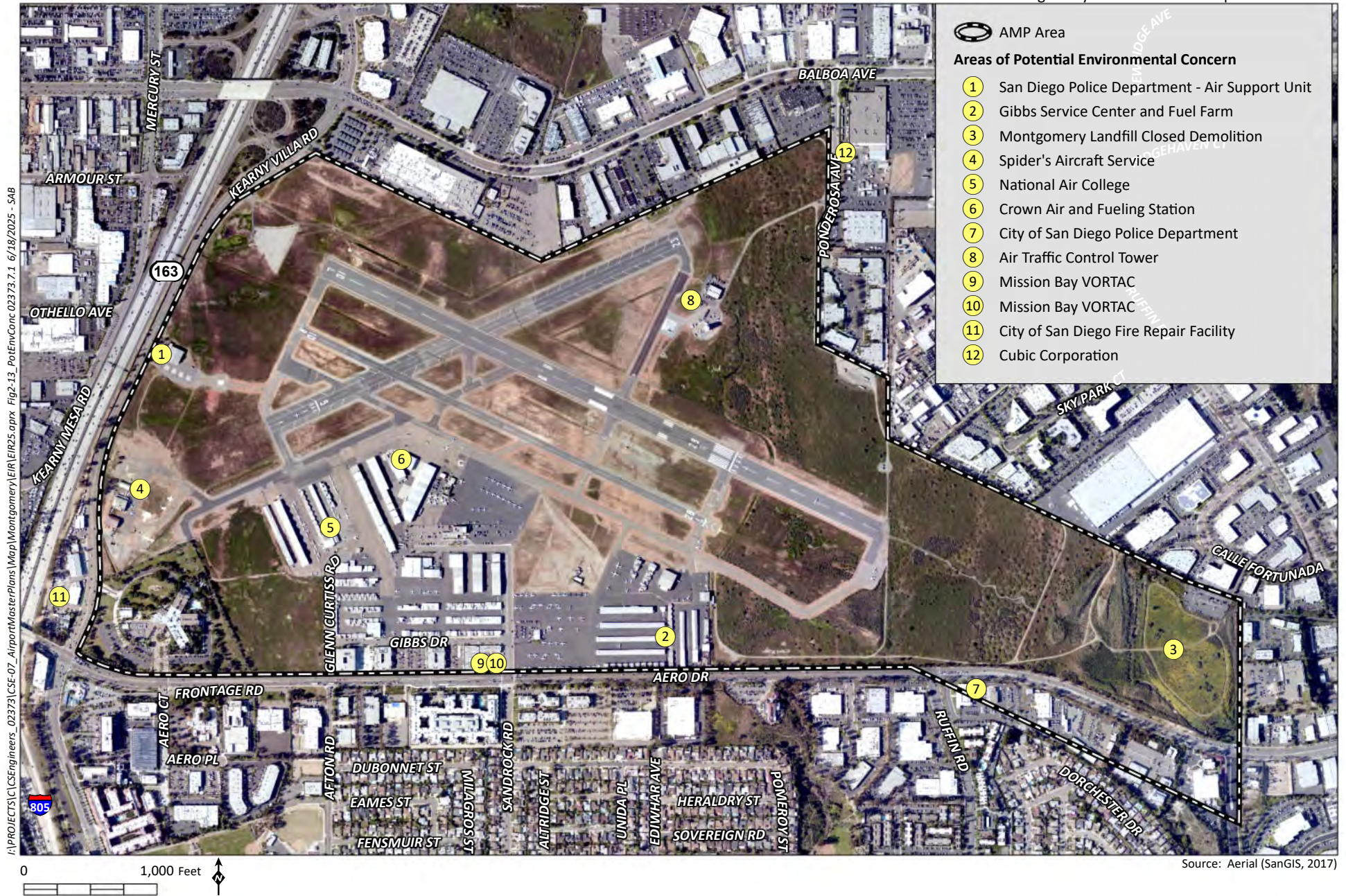
These sites are associated with four unauthorized release cases (H00465-001, -002, -003, and -004). Four USTs containing jet fuel and aviation fuel were removed between 1988 and 1992. The site occupant is listed for disposal of an unspecified organic mixture, organic solids, organic liquids, used oil filters and used batteries. Crown Air is also associated with active UST permits for operation of a 20,000-gallon aviation gas UST and a 20,000-gallon jet fuel UST. A violation for obstruction of secondary containment piping preventing drainage to sump was recorded in 2012. Remaining permit violations were minor or related to training or bookkeeping and are not an environmental concern at this time. Multiple inspection reports regarding BMPs, USTs, and hazardous materials handling indicate these facilities appear to be in compliance; violations of environmental concern were not noted.

San Diego City Public Works Department, Eastern Police Substation (9225 Aero Drive)

This property is located south of Aero Drive in the southeastern portion of the AMP area and has an active permit for a 10,000-gallon unleaded gasoline UST, a 1,000-gallon used oil UST, and a 1,000-gallon motor oil UST. A 10,000-gallon unleaded gasoline UST and a 550-gallon diesel UST were removed in 1988 and 2004, respectively. The facility also has active permits for storage and disposal of oil, diesel, gasoline, acetylene, antifreeze, brake fluid, used batteries, and lead containing waste; associated violations were minor and are not an environmental concern at this time.

Federal Aviation Administration Montgomery Field (4302/4298 Ponderosa Avenue)

This property is in the eastern portion of the AMP area and has one unauthorized release case (H21302-001) associated with soil contaminated by diesel from a former 1,000-gallon UST that was located in the area of the existing ATCT. A human health risk assessment determined the excess cancer risk to building occupants was less than significant and groundwater resources are not anticipated to be impacted by the soil contamination. A No Further Action Closure Letter sent by the RWQCB is dated May 10, 2011. The property is also associated with multiple active permits for storage of hazardous waste including waste oil, diesel fuel, organic waste, antifreeze, and used batteries; violations on file were minor and not of environmental concern.



TRM RCO/FAA PDS (8665 Gibbs Drive)

This property is located in the strip mall along the southern boundary of the AMP area along Aero Drive. The facility reportedly had one 80-gallon UST containing fuel for a generator. According to reports, the UST has been out of use since 1983; however, it is unclear whether it has been removed. The property is also listed for storage and disposal of waste oil and latex waste.

Mission Bay Vortac/Oasis Sports Medical Group (8575 Gibbs Avenue)

This property is located in the strip mall along the southern boundary of the AMP area along Aero Drive. The facility reportedly had one 515-gallon UST containing unleaded gasoline. The UST was installed in 1988 and it is unclear whether the UST has been removed or closed in place.

Off-Site Properties of Potential ConcernSan Diego City Fire Repair Facility/Rural Metro San Diego (3870/3880 Kearny Villa Road)

This property, adjacent to the southwestern corner of the AMP area, has five closed unauthorized release cases (H19194-001, -002, -003, -004, and -005). The most recent cases (-004 and -005) were due to a diesel release which affected soil and groundwater at the site. Both cases were closed in 2015. The property is also listed for storage and disposal of waste oil, cleaning solvents, propane, unleaded fuel, compressed gas, antifreeze, pharmaceutical waste, and firefighting foam concentrations. Although the facility is located downgradient of the AMP area, PFAS may have been released within the AMP area in conjunction with firefighting training and the use of Class B firefighting foam.

Cubic Corporation (9233 Balboa Avenue)

This property is located just east of the northernmost portion of the AMP area and has one closed unauthorized release case (H00070-001) and one open cleanup case (DEH2018-LSAM-00521). The property formerly used and stored acids and solvents for industrial purposes. A diesel UST was closed in place in 1987 and an aboveground storage tank (AST) containing trichloroethane was removed from the site in 1990. Metals, including copper, chromium, lead, and zinc, and CVOCs were reportedly detected in soil at the property. Approximately 40 cubic yards of soil with concentrations above cleanup levels were removed in 1989. Groundwater reportedly contained elevated levels of CVOCs and was believed to be a shallow perched water body. Perched groundwater was remediated via a pump and treat system in 1990. During the most recent investigation in December 2018, CVOCs were detected in soil below the applicable Environmental Screening Level but were above the mitigation measure for the property. CVOCs were also detected in soil vapor. Although areas of concern for this property are located approximately 150 feet east of the AMP area, concentrations of metals and CVOCs in soil and CVOCs in soil vapor have not been delineated in the direction of the AMP area. Indoor air samples within 50 feet of the AMP area were beneath laboratory detection limits. The property is proposed to be redeveloped under regulatory oversight and the investigation is ongoing.

2.5.6.3 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State. These maps place areas of the State into different Fire Hazard Severity Zones based upon fuels, terrain, weather, and other relevant factors. The zones are divided into three levels of fire hazard severity in either a Local Responsibility Area or State Responsibility Areas: Moderate, High, and Very High. State law requires local jurisdictions to identify Very High Fire Hazard Severity Zones (VHFHSZs) within their local responsibility areas. A local jurisdiction's mapping is based on CAL FIRE's mapping. Under state law, a local agency cannot decrease the level of Fire Hazard Severity Zone in a local responsibility area recommended by CAL FIRE. A local agency can only make additions to or increase the level of Fire Hazard Severity Zone recommended by CAL FIRE.

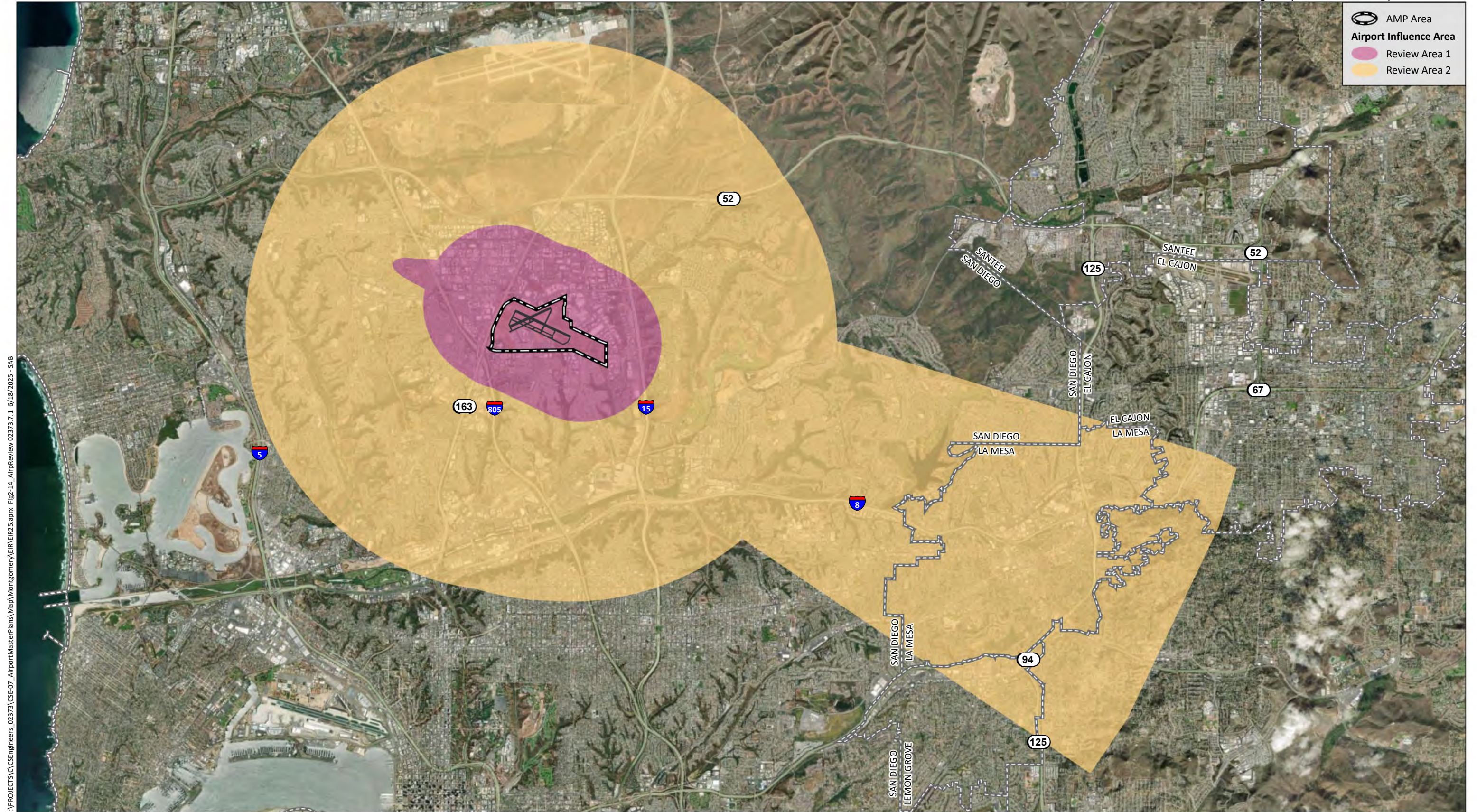
According to CAL FIRE mapping, the eastern half of the AMP area is mapped as a Moderate Fire Hazard Severity Zone. The remainder (i.e., the western half of the AMP area) is not mapped within a Fire Hazard Severity Zone. Off-site areas to the east of the AMP area associated with Murphy Canyon are considered VHFHSZs (CAL FIRE 2025). According to the City's proposed mapping, all but the developed central portion of the AMP area is within a VHFHSZ (City 2025).

2.5.6.4 Emergency Preparedness

The City is a participating jurisdiction in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MHMP), a countywide plan to identify risks and minimize damage from natural and man-made disasters (County 2023). The primary purposes of the MHMP include efforts to: enhance public awareness and understanding; create a decision tool for management; promote compliance with state and federal program requirements; enhance local policies for hazard mitigation capability; provide inter-jurisdictional coordination of mitigation-related programming; and achieve regulatory compliance. Additionally, the City is a participating agency in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP; County 2022). The EOP is used by partner agencies within the County to respond to major emergencies and disasters. Annex Q (Evacuation) of the EOP notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County..." with I-15, SR 52, SR 163, and I-805 identified as evacuation routes in the vicinity of the AMP area.

2.5.6.5 Aircraft Hazards

The State of California requires that the SDCRAA, as the ALUC, prepare an ALUCP for each public-use airport and military air installation in San Diego County. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area (AIA) for each airport over a 20-year horizon. The City implements the adopted ALUCPs with the Airport Land Use Compatibility Overlay Zone. Review Areas 1 and 2 for Montgomery – Gibbs Executive Airport are shown on Figure 2-14, *Montgomery-Gibbs Executive Airport Review Areas*. Projects located within the AIAs are reviewed for consistency with the ALUCPs.



Source: Aerial (DigitalGlobe, 2018).

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2.5.7 Hydrology and Water Quality

2.5.7.1 Drainage

Approximately 211 acres, or 38 percent, of the AMP area is developed with impervious surfaces. Impervious areas are generally associated with the developed southern portion of the AMP area, as well as the runways and taxiways in the central portion of the AMP area. Whereas storm water in the northern and eastern portions of the AMP area can be retained on site due to the presence of pervious soils and vegetation, storm water in the developed southern portion of the AMP area turns to runoff, which is then conveyed off site via paved surfaces, gutters, and storm drains.

In general, storm water runoff from the AMP area and surrounding areas within the approximately 3,150 -acre Murphy Canyon Basin drains to Murphy Canyon Creek, which eventually drains into the San Diego River. Storm water flow from the San Diego River is ultimately discharged into the Pacific Ocean.

The AMP area lies within the Mission San Diego hydrologic subarea of the Lower San Diego hydrological area, which is part of the San Diego River watershed. With a land area of approximately 434 square miles, the San Diego River watershed is home to approximately 520,000 residents and contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee, as well as several unincorporated areas. Approximately 44 percent of the San Diego River watershed is currently undeveloped. Important hydrologic resources in the watershed include five water storage reservoirs, a large groundwater aquifer, extensive riparian habitat, coastal wetlands, and tide pools (Project Clean Water 2019). Murphy Canyon Creek and the Lower San Diego River are within this watershed.

2.5.7.2 Floodplains

Based on mapping from the Federal Emergency Management Agency (FEMA), the AMP area is within Zone X, which is an area determined to be outside of the 0.2-percent annual chance floodplain and thus exhibits minimal flood hazards. The nearest floodplain is associated with Murray Canyon Creek situated to the southwest (south of Aero Drive) and an area to the east of Murphy Canyon Road associated with Murphy Canyon Creek (FEMA 2012).

2.5.7.3 Water Quality

Whereas storm water in the northern and eastern portions of the AMP area can be retained on site due to the presence of pervious soils and vegetation, storm water in the developed southern portion of the AMP area turns to runoff, which is then conveyed off site via paved surfaces, gutters, and storm drains. Thus, pollutants in runoff may reach receiving waters. Typical pollutants from existing uses within the AMP area include sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides.

Receiving waters from runoff within the AMP area include Murphy Canyon Creek, San Diego River, and ultimately the Pacific Ocean. Existing water quality conditions of these receiving waters are described below.

Beneficial Uses

Beneficial uses are the uses of water necessary for the survival or wellbeing of humans, plants, and wildlife. These water uses serve to promote the tangible and intangible economic, social, and environmental goals of humankind. The Water Quality Control Plan for the San Diego Basin (Basin Plan) prepared by the RWQCB identifies beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground waters.

Murphy Canyon Creek

Existing beneficial uses identified for Murphy Canyon Creek include Agricultural Supply, Industrial Service Supply, Contact Water Recreation, Non-contact Water Recreation, Warm Freshwater Habitat, Wildlife Habitat, and Rare, Threatened, or Endangered Species. Murphy Canyon Creek is excluded from the Municipal and Domestic Supply beneficial use.

San Diego River

Existing beneficial uses identified for the San Diego River include Agricultural Supply, Industrial Service Supply, Contact Water Recreation, Non-contact Water Recreation, Warm Freshwater Habitat, Wildlife Habitat, and Rare, Threatened, or Endangered Species. The San Diego River is excluded from the Municipal and Domestic Supply beneficial use.

Pacific Ocean

Existing beneficial uses identified for Pacific Ocean include Industrial Service Supply, Navigation, Contact Water Recreation, Non-contact Water Recreation, Commercial and Sport Fishing, Preservation of Biological Habitats of Special Significance, Wildlife Habitat, Rare, Threatened, or Endangered Species, Marine Habitat, Aquaculture, Migration of Aquatic Organisms, Spawning, Reproduction, and/or Early Development, and Shellfish Harvesting.

Clean Water Act Section 303(d) Impaired Water Bodies and Total Maximum Daily Loads

Under Section 303(d) of the CWA, states, territories and authorized tribes are required to develop a list of water quality limited segments. Waters on the list do not meet water quality standards even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires the establishment of priority rankings for water on the lists and development of action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego region.

One receiving water for the AMP area, the San Diego River (Lower), is currently listed as impaired (based on the 2014 – 2016 303[d] List). The pollutants/stressors causing impairment of the San Diego River (Lower) are benthic community effects, cadmium, indicator bacteria, nitrogen, oxygen (dissolved), phosphorus, total dissolved solids, and toxicity. There are three adopted TMDLs that are being implemented into the San Diego River (Lower) for bacteria and coliform. The estimated TMDL completion date for pollutants and stressors in the San Diego River (Lower) is 2029.

2.5.7.4 Groundwater

Groundwater is defined as subsurface water that occurs beneath the water table in soils and geologic formations that are fully saturated. Groundwater bearing formations sufficiently permeable to transmit and yield substantial quantities of water are called aquifers. A groundwater basin is defined as a hydrogeologic unit containing one large aquifer or several connected and interrelated aquifers. The principal groundwater basins in the San Diego region are relatively small in area and usually shallow. Although these groundwater basins are limited in size, the groundwater yield from the basins has been historically important to the development of the region. Nearly all of the local groundwater basins have been intensively developed for municipal and agricultural supply purposes.

Groundwater within the Mission San Diego hydrologic subarea of the Lower San Diego hydrological area of the San Diego hydrologic unit has identified existing beneficial uses of Agricultural Supply, Industrial Service Supply, and Industrial Process Supply. Municipal and Domestic Supply is a potential beneficial use.

2.5.8 Land Use

2.5.8.1 Existing Surrounding Land Uses

Community of Kearny Mesa

The AMP is within the community of Kearny Mesa, which encompasses approximately 4,423 acres and is predominantly urbanized and largely developed with industrial, commercial, and office uses due its role as a major employment center. Other uses include residential, mixed use, government/community facilities, health care, schools, parking lots, recreation and open space, communication and utilities, and transportation facilities. Existing land uses within Kearny Mesa are depicted on Figure 2-15, *Surrounding Land Uses*. Existing land uses immediately surrounding the AMP area include industrial/business park to the north and east, commercial to the west, and a mix of industrial/business park, commercial, and residential to the south along Aero Drive.

Kearny Mesa Community Plan

The Kearny Mesa Community Plan, (City 2020c) which was most recently updated in November 2020, (City 2020d) provides community-specific policies that further implement the General Plan with respect to the distribution and arrangement of land uses, local street and transit network; urban design guidelines; recommendations to preserve and enhance natural open space and historic and cultural resources; and prioritization and provision of public facilities within the Kearny Mesa community. The community plan update maintains strong employment areas and identifies new and expanded village areas that encourage mixed-use residential and employment land uses. The community plan update also enhances community connections with a comprehensive network of complete streets, urban paths, and paseos.

Land use designations under the Kearny Mesa Community Plan adjacent to the AMP area include Industrial and Technology Park to the north and east, Community Commercial to the west, and a

mix of Residential (very high density), Urban Employment Village (high density), Technology Park, Industrial and Technology Park, and Institutional to the south.

Community of Serra Mesa

The community of Serra Mesa is located to the south of the AMP area, across Aero Drive. While MYF does not fall within the limits of the Serra Mesa Community Planning Area, arriving and departing aircraft pass overhead and thus MYF is discussed in the community plan. The concerns stated in the plan include noise, approach patterns, and crash hazards. The plan recognizes that while aircraft noise levels may not exceed federal or state recognized annoyance level standards, it is still an important issue to residents.

Community of Clairemont Mesa

The community of Clairemont Mesa is located to the west of the AMP area, across I-805. As with Serra Mesa, Clairemont Mesa is affected by MYF even though MYF is outside of the official planning area. The main concerns of the community regarding MYF are noise and potential crash hazard. The community plan refers to the MYF ALUCP for development regulations for both airport development and any development in the designated AIAs.

2.5.9 Noise

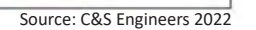
2.5.9.1 Noise and Sound Level Descriptors and Terminology

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound.

Noise level or sound level values presented in this PEIR are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ} , with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and sound levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level (L_{DN}), which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours, but no added weighting on the evening hours. Sound levels expressed in CNEL are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver contribute to the sound level and characteristics of the noise perceived by the receiver. The field of acoustics deals primarily with the propagation and control of sound.

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are



sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source determines the loudness of that source. A logarithmic scale is used to describe sound pressure level (SPL) in terms of dBA units. The threshold of hearing for the human ear is approximately 0 dBA, which corresponds to 20 micro Pascals (mPa).

Because decibels are logarithmic units, SPL cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3-dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one source under the same conditions.

2.5.9.2 Vibration Descriptors and Terminology

Vibration is defined as any oscillatory motion induced in a structure or mechanical device as a direct result of some type of input excitation. Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or manufactured (explosions, trains, machinery, traffic, construction equipment, etc.). Vibration sources may be transient, steady-state (continuous), or pseudo steady-state. Examples of transient construction vibrations are those that occur from blasting with explosives, impact pile driving, demolition, and wrecking balls.

Ambient and source vibration information are expressed in terms of the peak particle velocity (PPV) in inches per second (in/sec). The root mean square (RMS) of a signal is the average of the squared amplitude of the signal in decibels (relative to 1 micro-inch per second). Because the net average of a vibration signal is zero, the RMS amplitude is used to describe the “smoothed” vibration amplitude. The RMS amplitude is always less than the PPV and is always positive. The RMS average is typically calculated over a one-second period.

The background vibration velocity level in residential areas is usually 50 vibration decibels (VdB) or lower; this is well below the level perceptible by humans, which is approximately 65 VdB. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

2.5.9.3 Existing Noise Environment

The primary existing noise generators within and adjacent to the AMP area include aircraft operations at MYF and vehicles traveling on nearby freeways (I-805, I-15, and SR 163) and major roadways.

The noise contours associated with MYF are shown on Figure 2-16, *Existing Montgomery-Gibbs Executive Airport Noise Contours*. The 70- and 75-CNEL contours are generally confined to the AMP area, except where the 70 CNEL contour extends to the west just beyond SR 163. The 65 CNEL contour extends outside of the AMP area boundary to the northwest past the intersection of Balboa

Avenue and Ruffner Street. The 60 CNEL contour extends outside of the AMP area boundary to the southeast, into the Stonecrest Specific Plan area and to the northwest, west of I-805 and north of Balboa Avenue.

NSLUs are land uses that may be subject to stress and/or interference from excessive noise. The most common noise-sensitive uses include residences, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, childcare facilities, and certain types of passive recreational parks and open space. Existing NSLUs near the AMP area include residences to the south across Aero Drive, a hotel, the Serra Mesa – Kearny Mesa Branch Library, private schools, and daycares. Industrial and commercial land uses are generally not considered to be sensitive to noise. For additional information, see Section 5.9 of this PEIR and Appendix G, Construction Noise Impact Report.

2.5.10 Public Services

2.5.10.1 Police Protection

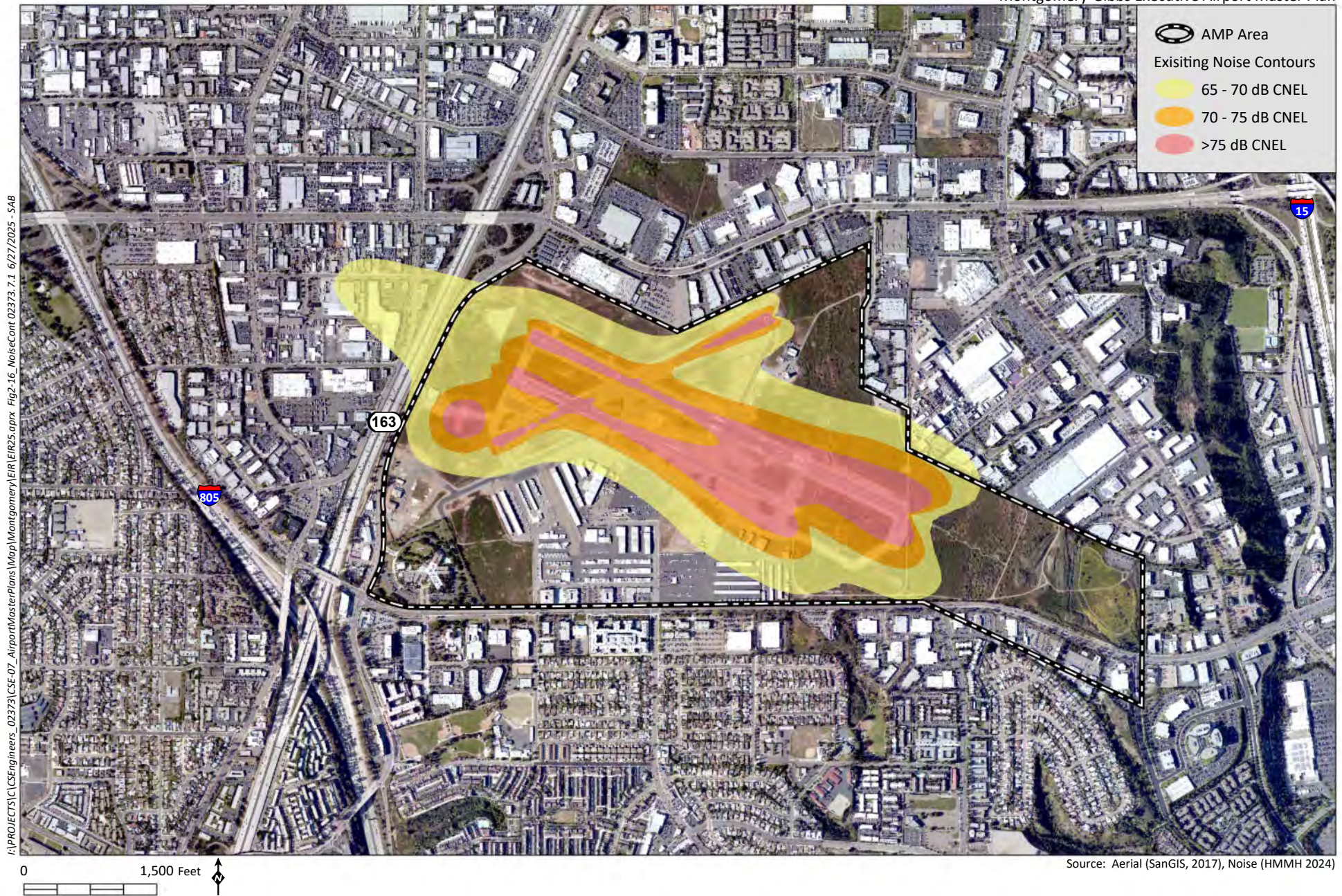
The San Diego Police Department (SDPD) provides police services including patrol, traffic, investigative, records, laboratory, and support services to the City (City 2024a). The AMP area is currently patrolled by the Eastern Division of the SDPD. The Eastern Division serves the neighborhoods of Allied Gardens, Birdland, College East, College West, Del Cerro, Grantville, Kearny Mesa, Lake Murray, Mission Valley East, Qualcomm, San Carlos, Serra Mesa, and Tierrasanta. The Eastern Division Police Substation is located adjacent to the AMP area at 9225 Aero Drive. The SDPD's Air Support Unit is located at MYF. The Air Support Unit bases several helicopters out of MYF that are used for search and rescue, aerial security, and air support to patrol operations.

2.5.10.2 Fire Protection

Fire protection services to the AMP area are provided by the San Diego Fire-Rescue Department (SDFD). The SDFD serves a total area of approximately 343 square miles, including 17 miles of coastline extending three miles offshore, and a population of approximately 1.42 million people. The SDFD has a current total of 52 fire stations and nine permanent lifeguard stations, and employs 892 uniformed personnel, 98 lifeguards, and 246 civilian personnel. In addition to fire protection services, the SDFD also provides emergency medical services (EMS).

Fire protection services to the AMP area are provided by Fire Station 28, located at 3880 Kearny Villa Road, adjacent to the AMP area. Fire Station 28 was originally built in 1958 and serves the Kearny Mesa community, the AMP area, and surrounding areas, totaling approximately 7.76 square miles. This station provides fire protection and advanced life support services and includes a fire engine, aerial truck, and water tender. Fire Station 28 is also responsible for testing the pumping capacity of each new fire engine before it is placed into a station (City 2024c).

In 2017, the City retained Citygate Associates, LLC to perform a Standards of Response Cover Review (Citygate Associates, LLC 2017) to review the adequacy of the current fire station resource deployment system and the emergency incident outcomes desired by the community. This study concluded that additional fire-rescue resources are needed to meet best practice outcome response times for all neighborhoods. For effective outcomes on serious medical emergencies and to keep



serious, but still emerging, fires small, the City's adopted Fire-Rescue response time policy is that the first-due fire unit should arrive within 7 minutes and 30 seconds of fire dispatch, 90 percent of the time. Fire-Rescue's actual performance from fire dispatch call receipt to first crew on scene is 8 minutes and 10 seconds to 90 percent of fire and emergency medical services incidents. Only seven fire stations meet the 90 percent best practice goal of 7 minutes and 30 seconds from fire dispatch to first unit on scene. The average response time for Station 28 is 8 minutes and 30 seconds (Citygate Associates, LLC 2017).

Fire-Rescue does not meet the City's goals for dispatch and crew turnout time. The issue with response times is the travel time from too few fire stations across an increasingly traffic-congested road network. Fire-Rescue is not meeting the City's adopted goal of five minutes travel time for the first arriving unit. The Citywide actual performance is 6 minutes and 9 seconds from crew notification. Only four fire stations meet the five-minute travel time goal. The average travel time for Station 28 is 6 minutes and 31 seconds (Citygate Associates, LLC 2017).

These results are reflective of the large size of some station areas, simultaneous calls for service, road network design, and traffic congestion issues. Fire-Rescue is staffed for several serious building fires at a time and multiple medical calls for service at a time. The regional automatic and mutual aid response system delivers greater alarm and multiple incident support.

The City's EMS also has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. There are four levels of calls. Level 1 is the most serious (e.g., heart attack, shortness of breath), and the closest fire engine and an advanced life support ambulance respond to this type of call. The fire crew must respond within eight minutes of being dispatched pursuant to City requirements, and the ambulance must respond within 12 minutes for Level 1 (the most serious) calls. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advance life support ambulance responds to Level 2 calls; no fire station staff or equipment are deployed. The response time for a Level 2 call is 12 minutes, the same as for a Level 1 call. For a Level 3 call (e.g., someone having extended flu-like symptoms), either a basic or advance life support ambulance would respond. A basic ambulance is staffed with two EMTs, whereas an advance life support ambulance is staffed with one paramedic and one EMT. The response time for a Level 3 call is 18 minutes. For a Level 4 call, which is not an emergency (e.g., the patient could have driven themselves to a hospital), a basic ambulance would respond within 18 minutes of being dispatched.

2.5.11 Public Utilities

The AMP area is served by a variety of public utilities including water, sewer, and storm water infrastructure; energy infrastructure; energy infrastructure; and solid waste collection and recycling services. Many of the infrastructure needs for these services are managed through the City's Capital Improvements Program (CIP). The City conducts a biannual review of public services, facilities, and utilities implementation in conjunction with the budget/CIP review cycle. As part of this review process, the City assesses the need for new or expanded services and public facilities to provide appropriate services and infrastructure commensurate with population increase. A description of the existing conditions of each of these public utilities is provided below.

2.5.11.1 Water Supply

City of San Diego

The City's Public Utilities Department (PUD) provides water services to approximately 1.4 million customers through a water system that serves over 404 square miles comprised of land within the City, including the AMP area, as well as several communities outside the City. The City's PUD imports 85 to 90 percent of its water from other areas such as northern California and the Colorado River. To do this, the PUD purchases imported water from the San Diego County Water Authority (SDCWA). The SDCWA was formed for the purpose of purchasing Colorado River water from The Metropolitan Water District of Southern California (MWD) for conveyance to San Diego County.

The City's water system consists of a large network of infrastructure connecting residents and businesses to the water supply. The City's water system includes nine surface raw water storage reservoirs, three water treatment plants, 29 potable water storage facilities, approximately 3,300 miles of water transmission and distribution pipelines, and 49 water pump stations. The City runs three water treatment operations—Otay Water Treatment Plant, Alvarado Water Treatment Plant, and Miramar Water Treatment Plant—with a total of 298 million gallons per day capacity.

The City also runs two recycled water facilities. The North City and South Bay Water Reclamation Plants were built to treat wastewater to a level that would be approved for non-potable uses such as landscape irrigation and manufacturing. These facilities provide water to City residents and businesses, as well as other jurisdictions and water districts. Potable reuse through the Pure Water San Diego Program is currently under development.

Established in 1985, the PUD's Water Conservation Program was established to reduce San Diego's dependence on imported water. Savings are achieved through the implementation of programs, policies, and ordinances promoting water conservation practices. All residential, commercial, and industrial buildings are required to be certified as having water-conserving plumbing fixtures in accordance with SDMC Chapter 14, Article 7, Division 4. The PUD works in collaboration with the MWD and SDCWA to formulate new conservation initiatives and annually checks progress toward conservation goals.

The City's 2020 Urban Water Management Plan (UWMP) was developed to serve as the City's overarching water resources planning document to address the City's water system, water demand, water supply resources, conservation efforts, and historic and projected water use. This Plan was prepared in accordance with the Urban Water Management Act, requiring urban water suppliers to adopt and submit a plan every five years to the California Department of Water Resources. Every urban water supplier providing water for municipal purposes to more than 3,000 connections or supplying more than 3,000-acre feet (AF) of water annually must comply.

The PUD also adopted the Long-Range Water Resources Plan in 2013, which was most recently updated in 2019. This Plan provides guidance and input on alternative strategies for meeting San Diego's water needs by addressing concerns such as population growth and water resource diversification. The Plan details existing water supplies, new water supply opportunities, objectives, performance measures, and conclusions and recommendations.

In accordance with the Conservation Element of the City's General Plan (Policy CE-A.11), development projects are required to implement sustainable landscape design and to use recycled water to the maximum extent feasible in development projects to aid in water conservation (City 2024a).

The Metropolitan Water District of Southern California

MWD was formed in 1928 to develop, store, and distribute supplemental water in Southern California for domestic and municipal purposes. MWD is a wholesale supplier of water to its member agencies, which includes the SDCWA. It obtains supplies from local sources as well as the Colorado River via the Colorado River Aqueducts, which it owns and operates. It also obtains water supplies via the Sacramento-San Joaquin Delta via the State Water Project. Planning documents such as the Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP) help to ensure the reliability of water supplies and the infrastructure necessary to provide water to Southern California.

MWD's IWRP was updated in 2015 to accommodate recent changes in retail demands, water use efficiency, and local and imported supplies, and to update resource targets. The IWRP sets reliability targets to identify developments in imported and local water supply and in water conservation to reduce water shortages and mandatory restrictions. These regional targets are set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking, and water transfers. MWD's 2015 RUWMP, adopted in June 2016, documents the availability of these existing supplies and additional supplies required to meet future demands. It includes the resource targets in the IWRP and contains an assessment of water supply reliability. The Long-Term Conservation Plan was implemented in July 2011 with the goal to achieve the conservation target in MWD's 2010 IWRP as well as to pursue water efficiency innovations and to transform the public's perception of the value of the regional water supply.

San Diego County Water Authority

SDCWA is an independent public agency that serves as the County's regional water wholesaler. As a retail member agency of SDCWA, the PUD purchases water from the SDCWA for retail distribution within its service area.

SDCWA's 2020 UWMP was adopted by SDCWA Board in May 2021 in accordance with state law and the RUWMP. The 2020 Plan contains a water supply reliability assessment that identifies a diverse mix of imported and local supplies necessary to meet demands over the next 25 years based on an average, single-dry year, and multiple-dry year periods. The UWMP documents that no shortages are anticipated during a normal year, single dry-year, or multiple dry-year through 2045. SDCWA also prepares an annual water supply report providing updated documentation on existing and projected water supplies.

2.5.11.2 Water, Sewer, and Storm Water Infrastructure

Water Distribution System

The City's PUD supplies potable water to the AMP area via the Shepherd Canyon Pipeline, which is fed by the SDCWA's Second Aqueduct. Water from the Second Aqueduct is treated at both the City's Miramar Water Treatment Plant (WTP) and the City's Alvarado WTP.

Wastewater Collection System

The City's PUD provides wastewater collection, treatment, reclamation and disposal services to the San Diego region, including the AMP area, through its Metropolitan Sewerage System. The Metropolitan Sewerage System treats the wastewater from the City of San Diego and 15 other cities and districts from a 450-square mile area with a population of over 2.2 million. The system treats an average of 180 million gallons of wastewater each day. Sewage collected is conveyed and processed through a sewer infrastructure system and ultimately discharges at the Point Loma WTP.

In general, all wastewater generated in the AMP area is conveyed southwesterly towards the North Metro Interceptor, where it continues through to the Point Loma WTP.

Storm Water Conveyance System

As discussed in Section 2.5.7.1, whereas storm water in the northern and eastern portions of the AMP area can be retained on site to the presence of pervious soils and vegetation, storm water runoff originating in the developed southern portion of the AMP area is conveyed to receiving waters via paved areas, gutters, and storm drains. In general, storm water runoff from the AMP area and surrounding areas within the approximately 3,150-acre Murphy Canyon Basin drains to Murphy Canyon Creek, which eventually drains into the San Diego River. Storm water flows from the San Diego River is ultimately discharged into the Pacific Ocean.

2.5.11.3 Energy

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the AMP area. SDG&E is regulated by the California Public Utilities Commission (CPUC) who sets the gas and electricity rates for SDG&E and is responsible for making sure that California utilities customers have safe and reliable utility service at reasonable rates, protecting utilities customers from fraud and promoting the health of California's economy.

SDG&E supplies customers with electricity generated both locally and outside of the utility's service territory, with local facilities currently capable of generating a total of approximately 3,100 megawatts of power. SDG&E owns and contracts with generation facilities both within and outside its service territory, and power is also produced in local facilities that are non-utility owned. Local generation is important for local power supply needs due to the voltage support it provides that keeps the electric system running smoothly.

Natural gas is imported into the San Diego region by pipeline after being produced at any of several major supply basins located from Texas to Alberta, Canada. Although the San Diego region has

access to all of these basins by interstate pipeline, the final delivery into the SDG&E system is dependent on just one Southern California Gas Company pipeline that enters San Diego County from Orange County located along I-5.

2.5.11.4 Communications

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Spectrum, and other independent cable companies. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed development projects. Individual projects consisting of more than four lots are subject to SDMC Section 144.0240, which requires most privately owned utility systems and service facilities to be placed underground.

2.5.11.5 Solid Waste Management

Solid waste generated in the AMP area is collected by private franchised haulers and taken to one of three active landfills permitted to accept solid waste: West Miramar Sanitary Landfill (Miramar Landfill), Otay Landfill, and Sycamore Sanitary Landfill (Sycamore Landfill). Miramar Landfill and Sycamore Landfill are located within the City. Otay Landfill is located within an unincorporated area within the City of Chula Vista. The Greenery at the Miramar Landfill provides the majority of organic waste processing capacity.

Per Assembly Bill (AB) 341, 75 percent of waste must be diverted from disposal in landfills. Of the remaining 25 percent of residuals requiring disposal, 15 years of disposal capacity is the target. West Miramar Landfill is permitted to receive 8,000 tons per day and, on average, it receives less than 1,000,000 tons per year. The anticipated closure date for West Miramar Landfill is 2031. Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day and is expected to operate until 2042. Otay Landfill is permitted to receive 6,700 tons per day and is expected to serve the region through 2030 (California Department of Resources Recycling and Recovery [CalRecycle] 2024).

2.5.12 Transportation and Circulation

2.5.12.1 Roadways and Access

The AMP area is accessed from the north and south via I-805, SR 163, and I-15 and from the east and west via I-8 and SR 52. The AMP is bound by Balboa Avenue to the north, Ruffin Road to the east, Aero Drive to the south, and Kearny Villa Road to the west. Primary access points to the AMP area are located on Aero Drive where Aero Drive intersects with John J. Montgomery Drive and Glenn H. Curtiss Road. Additional access points are located to the east along Aero Drive and along Kearny Villa Road. Currently, MYF generates approximately 2,084 average daily trips (CR Associates 2025).

2.5.12.2 Bicycle Facilities

Existing bicycle facilities adjacent to the AMP area include bicycle lanes (Class II) along Kearny Villa Road, Balboa Avenue, and Ruffin Road, and separated bikeways (Class IV) along Aero Drive.

2.5.12.3 Pedestrian Facilities

Existing pedestrian facilities in the vicinity of the AMP area include sidewalks along Aero Drive from the intersection with Kearny Villa Road to the west and I-15 to the east. The sidewalk on the AMP area side of Aero Drive is incomplete, but one is available along the south side of the street. Within the AMP area there is a sidewalk on John J. Montgomery Drive leading to the administrative building and a graded dirt path along Glenn H. Curtiss Road leading to the National Air College parking lot. There are crosswalks over Aero Drive at both John J. Montgomery Drive and Glenn H. Curtiss Road.

2.5.12.4 Public Transportation

The MYF is served by Metropolitan Transit System Bus Route 25 (Fashion Valley – Kearny Mesa TC). Stops for this route are located adjacent to the AMP area where Aero Drive intersects with John J. Montgomery Drive and Glenn H. Curtis Road. Stops are made approximately every 30 minutes.

2.5.13 Visual Effects and Neighborhood Character

2.5.13.1 Visual Character and Resources

The visual character of the areas surrounding the AMP area is that of a highly developed landscape. The AMP area is surrounded by industrial, institutional, and commercial land uses, with residential and park uses located farther to the north and south (Figure 2-15). Major transportation facilities, including I-805, SR 163, and I-15, provide expansive, hardscaped linear elements that further contribute to the developed nature of the areas surrounding the AMP area. There are no designated state scenic highways within the view shed of the AMP area.

Topographically, the Kearny Mesa area lies on a relatively flat top mesa and overall has little variation in landforms. However, canyon areas along I-15 and to the south of SR 52 provide open space and visual relief from the built environment.

2.5.13.2 Urban Form

Given the prevalence of industrial and commercial development, block sizes across Kearny Mesa, particularly east of SR 163, are large to accommodate parcel sizes commensurate with these types of uses. Streets generally west of SR 163 form a more distinct grid pattern with smaller block sizes and parcels. Industrial and commercial uses are still present in this area, but on a smaller scale compared to the eastern counterpart.

The presence of freeways and major arterial corridors contributes to the urban form of the community as they create an emphasis on the automobile. Visual elements are positioned based on this linear configuration. Signage, landscaping, and surface parking lots line the roadways and

buildings are set back from the roadways but are generally arranged parallel to the roadway alignments.

Building forms vary but are dominated by one- to two-story industrial buildings that range in size and style. Office-production industrial buildings include single-story massing, a styled front office attached to a warehouse space, and a loading area with warehouse doors. Industrial park complex buildings are typically one or two stories and comprised of multiple buildings with unifying design details for multiple tenant use. Most industrial buildings ubiquitously exhibit a Modernist architectural style where the materials and construction methods convey the style. Common materials for existing industrial buildings within Kearny Mesa include glass, concrete masonry units, decorative block, cast concrete, steel, and aluminum.

Commercial buildings consist of strip malls, freestanding retail buildings, and office parks. Most of the strip malls are single story with a linear arrangement and are I-, U-, or L-shaped. Standalone commercial buildings are designed with features specific to the user that allow for a specific category to operate in the building such as gas pump canopies, drive-throughs, or garage bays. Office park buildings are one or more stories and consist of multiple buildings with unifying design details for multiple tenants and typically include exterior courtyards between the buildings. Commercial and retail buildings in Kearny Mesa feature stylistic influences from various sub-styles of Modernism. Building materials used on existing commercial and retail buildings in Kearny Mesa include glass, concrete masonry units, decorative block, cast concrete, and metal.

Residential buildings include one- to two-story single-family homes to multi-story, multi-family buildings in larger mid-rise style buildings. Most of the existing residential development in Kearny Mesa has occurred within the last 25 years, resulting in building forms and design that are more contemporary and urban than existing commercial and industrial buildings.

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3.0 PROJECT DESCRIPTION

3.1 Local Planning Context

The City Airports Division owns and operates MYF as a general aviation airport located within the Kearny Mesa community north of Aero Drive, east of SR 163, south of Balboa Avenue, and west of Ruffin Road (see Figures 2-1 and 2-2 of this PEIR).

Airport planning occurs at the national, state, regional, and local level, with the goal of the master planning process to guide planning practices at the local level. The Airport is included in the National Plan of Integrated Airport Systems (NPIAS), which identifies airports that are significant to the national air transportation system and therefore eligible for grant funding under the FAA's Airport Improvement Program (AIP). In administering funding, the FAA uses the NPIAS, which supports the FAA's strategic goals for safety, system efficiency, and environmental compatibility by identifying the specific airport improvements that will contribute to the achievement of those goals.

Due to MYF's proximity to downtown San Diego and the large population served, the Airport is classified by the NPIAS as a national reliever airport (FAA 2024a). A reliever airport is one that is in place to accommodate overflow and general aviation traffic that would otherwise cause congestion at a neighboring airport, in this case San Diego International Airport (SAN). At the state level, the California Aviation System Plan 2010 System Needs Assessment identified MYF as the only Metropolitan General Aviation Airport in San Diego County.

The SDCRAA developed the Regional Aviation Strategic Plan (RASP) to take a comprehensive look at the civilian airports in the San Diego County region. The RASP explored a scenario that proposed to preserve SAN's airfield capacity for commercial passenger service by making improvements and accommodating general aviation traffic at MYF, Gillespie Field Airport, and Brown Field Municipal Airport. The 2021 RASP Implementation Report documents the region's collective progress in implementing the RASP and its continued compatibility with the San Diego Association of Government's (SANDAG's) regional transportation planning efforts (SDCRAA 2021).

An AMP presents the community and airport's vision for a 20-year strategic development plan based on the forecast of activity. It is used as a decision-making tool and is intended to complement other local and regional plans. In 2017, the City began developing an update to the AMP for MYF to determine the extent, type, and schedule of development needed based on current projections. The AMP comprises six sections, including: Section 1, Inventory, Surveys, & Data Collection; Section 2, Forecast; Section 3, Facility Requirements; Section 4, Environmental Overview; Section 5, Alternatives; and Section 6, Economic Impact Analysis (C&S Engineers 2019). The AMP also includes an Airport Layout Plan (ALP) which graphically depicts all planned development at the airport within the 20-year planning period as determined in the AMP. This drawing requires approval by the FAA, which makes the airport eligible to receive federal funding for airport improvements and maintenance under the FAA's AIP.

The conceptual plan selected by the Airports Advisory Committee to implement the AMP is shown graphically on Figure 3-1, *Proposed Airport Plan*. This plan is also referred to as the Preferred Plan within the AMP. For the purposes of the analysis within this PEIR, this plan is also referred to as the

project. Figure 3-2, *Proposed Airport Layout Plan*, graphically depicts all planned development at the airport within the 20-year planning period (through 2037) as determined in the AMP.

3.2 Facility Needs Assessment

The 20-year planning period for the AMP begins with the base year of 2017 and extends through 2037. Development needs are broken down into short-term (1 to 5 years), mid-term (6 to 10 years), and long-term (11 to 20 years). Short-term planning is focused on addressing immediate deficiencies, mid-term planning focuses on a more detailed assessment of needs, and long-term planning primarily focuses on the ultimate role and needs of MYF. The facility needs assessment is in part an examination of the airport's current capacity, current deficiencies, needed improvements, and forecasted future needs.

3.2.1 Facility Capacity

3.2.1.1 Airside Capacity

Calculations based on formulas devised by the FAA are used to understand the current capacity of infrastructure such as runways, taxiways, and IAPs. These values are compared to existing and future demand to determine the need for future capacity-enhancing infrastructure such as additional runways or taxiway exits. Airside capacity is a measure of the number of aircraft that can operate at an airport in a given timeframe. Capacity is most often expressed in hourly or annual measures.

The major components to be considered when determining an airport's capacity include runway orientation and configuration, runway length, and runway exit locations. Additionally, the capacity of any given airfield system is affected by operational characteristics such as fleet mix, climatology, and IAPs.

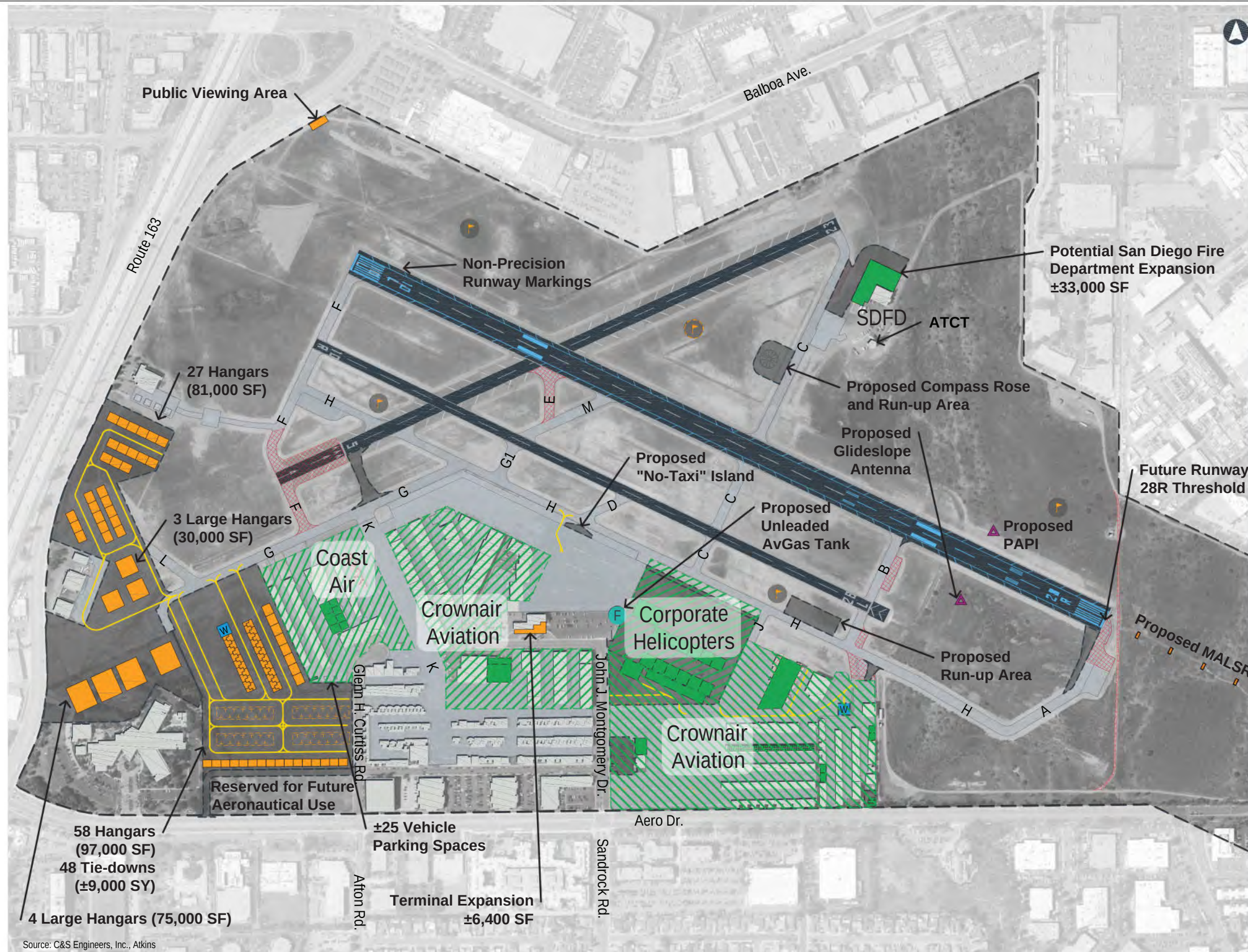
Based upon the FAA guidance and formula for calculating capacity, MYF currently has adequate runway and taxiway capacity and does not have a need for capacity enhancing runway and taxiway projects within the 2017 to 2037 planning horizon and thus improvements that enhance the capacity of the runway or taxiways are not included as part of the AMP. However, as discussed in Section 3.2.2, *Facility Deficiencies*, there are current airside facility safety and configuration concerns that need to be addressed. Additionally, Section 3.2.3, *Facility Demand Forecasts*, provides a foundation for planning for the future airside needs and the recommended airside components during the 20-year planning period.

3.2.1.2 Landside Capacity

As discussed in detail below in Section 3.2.2 and 3.2.3, currently some of the MYF landside facilities need additional space to adequately meet the existing demands. Several of the landside facilities, such as the hangar and apron area space, as presently configured would not meet the demands forecasted for the 20-year planning period.



Montgomery-Gibbs Executive
Airport Master Plan



Source: C&S Engineers, Inc., Atkins

- Legend**
- Property Line
 - Existing Buildings
 - Proposed Buildings
 - Existing Airfield Pavement
 - Proposed Pavement
 - Proposed Demolition
 - Private Leasehold Area
 - Private Leasehold Proposed Development
 - Proposed Taxiway/Taxilane Centerline
 - Proposed Runway Markings
 - Proposed Aircraft Tie-Downs
 - Proposed Wash Rack
 - Proposed Fuel Island
 - Proposed Segmented Circle
 - Proposed Wind Cone
 - Proposed Navigational Aid



ATKINS
Member of the SNC-Lavalin Group



Source: C&S Companies 2024

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3.2.2 Facility Deficiencies

As discussed above, runway and taxiway capacity have been determined to sufficiently meet the existing and forecasted demand; however, there are existing airside and landside deficiencies at MYF. These deficiencies are primarily a function of increased use or changes in existing or forecasted use patterns, and FAA regulations and design standards. These deficiencies are discussed in detail in 3.2.2.1, *Airside Facility Deficiencies*. The subsequent proposed improvements are also discussed in Section 3.4, *Major Components*, of this chapter.

3.2.2.1 Airside Facility Deficiencies

Hotspots

A hotspot is defined by the FAA as a runway safety related problem area on an airport that presents increased risk during surface operations. As shown on Figure 2-6, there are three existing taxiway hotspots within MYF:

- **Hotspot 1** is at the intersection of Taxiways E and M. The existing geometry of Taxiway E is not considered optimal due to the taxiway intersecting more than one runway at this location. Ideally, taxiways should not coincide with the intersection of two runways. Taxiway M is an acute-angled exit taxiway which allows aircraft to exit Runway 10L/28R at a higher speed than a perpendicular taxiway exit. This taxiway leads directly to Runway 10R/28L and creates an inadvisable runway crossing which does not provide the pilot with an effective view of Runway 10R/28L in both directions.
- **Hotspot 2** is located on Taxiway F between Runways 10L and 10R. This area historically has a high level of runway incursions due to aircraft exiting Runway 28R and crossing the Runway 10L threshold without clearance.
- **Hotspot 3** is at the intersection of Taxiway B and Taxiway H. Aircraft leaving the apron on Taxiway B can currently taxi directly on to Runway 28L without making any 90-degree turns, creating a direct runway access issue.

Full Length Parallel Taxiway

Currently, MYF has a single full-length parallel taxiway located on Runway 10R/28L. However, the lack of full-length parallel taxiways on every active runway at MYF increases congestion and delays.

Taxiway A

While not formally recognized as an airfield hotspot, this location has been identified by the FAA as an area of high incidence of runway incursions at MYF. This is due to the hold bay configuration and taxiway markings, as well as nonstandard taxiway geometry at the Runway 28R threshold.

Taxiway Fillets

A taxiway fillet is the extra wide area provided along a curved taxiway path so that the aircraft rear wheel does not extend off the edge of the pavement. The fillets at taxiway/runway and taxiway/taxiway intersections at MYF do not meet the current FAA design standard.

Run Up Areas

There are several deficiencies within the existing run-up areas at MYF. Both designated run-up areas lack the proper markings to guide aircraft in and out. The boundaries to the area south of Runway 28R presently do not clear the Taxiway A taxiway object free area (TOFA), and the boundaries of the area south of the end of Runway 10R do not remain clear of the Runway 5/23 Runway Obstacle Free Zone. Additionally, the end of Runway 23 on Taxiway C, and south of the end of Runway 28L on Taxiway B are being used as run up areas. Both areas lack sufficient depth to clear the TOFA.

Airfield Pavement

A Pavement Maintenance Management Plan was prepared for MYF in February 2018. The results concluded that portions of Runway 10R/28L have a poor Pavement Condition Index (PCI) and the following taxiway segments and apron areas were also classified as having a poor PCI:

- Taxiway H: From the connection of Taxiway A to Taxiway G.
- Taxiway B: In between Runway 28L end and Taxiway A, as well as half-way starting at the Runway 28L end and proceeding towards Runway 10L/28R.
- Taxiway D: Entire taxiway.
- Taxiway C: All the pavement between Taxiway A and Runway 10R/28L, as well as starting at Runway 10R/28L and proceeding halfway towards Runway 10L/28R.
- Taxiway L: Entire taxiway.
- Taxiway K: Entire taxiway.
- Helicopter Taxiway: All pavement areas.
- Apron area located directly off Taxiway H.
- Apron area located directly south of the previously listed apron area. This area includes the hangars located on the southern portion of MYF property.
- Apron area located directly to the west of the end of Taxiway K. This hangar area includes the hangars that are positioned in the east-west direction.

3.2.2.2 Landside Facility Deficiencies

Taxilanes

A taxilane is used by aircraft for low speed and precise taxiing. They are generally located outside of the movement area, meaning that aircraft may navigate on them without receiving clearance from the ATCT. MYF has taxilanes coming off Taxiway G and Taxiway H that lead to the aircraft parking aprons and hangars. Several taxilanes at MYF do not meet the FAA established taxilane safety area requirements, and nearly all the taxilanes fail to meet the TOFA requirements. Additionally, parallel Taxilane K does not meet the FAA centerline separation requirement. General aviation airports often do not meet the full FAA design standards regarding taxilane safety areas as they are frequently designed with hangar rows and taxilanes that are specifically intended for use by an aircraft substantially smaller than the design aircraft. Additionally, the FAA will often allow non-compliant taxilanes to remain but will require full compliance on any newly constructed taxilanes that accept FAA funding.

Aircraft Apron Parking

The based aircraft apron is nearly at capacity, or depending on the location on the airfield, at capacity. Currently, 56 of the total based aircraft on the airfield are operated by the six flight schools located at the MYF. Furthermore, 45 out of the 56 flight school aircraft, or 80 percent, are parked on the based aircraft aprons. During peak activity periods for the FBOs, temporary parking space for some of the larger, transient turbine aircraft is inadequate. Most of the transient apron parking is located adjacent to the terminal building and the Crownair FBO on the south side of the airfield. Overflow of based aircraft parking has begun to encroach upon the limited transient apron parking available for MYF. This also makes it increasingly more difficult for transient visitors to temporarily park their aircraft in a convenient location, such as in front of the terminal building in the designated transient/visitor parking area.

Terminal

The terminal building at the Airport is a multi-functional building. It has undergone several upgrades since its original construction in 1969; the most recent occurred in 2021. The existing approximately 10,000-SF footprint terminal building does not meet the space requirements either by itself or with the combined shared space from the two FBOs (6,600 SF) on the airfield through the planning period. Although the terminal building appears to be in overall good condition, standard energy and water efficiency improvements are needed, such as mechanical, electrical, and plumbing upgrades.

Perimeter/Security Fencing

The primary function of airport fencing is to restrict inadvertent and intentional unauthorized entry to the Airport by individuals or wildlife. MYF is not a 14 CFR Part 139 certificated airport (airports that serve scheduled and unscheduled air carriers), and therefore does not require any security measures. However, at a minimum, most general aviation airports usually maintain some type of perimeter fencing, especially when located in busy urban areas. MYF currently has fencing and access control measures in place that provide a layer of security and safety for its users and the public. Overall, the 8-foot high, galvanized chain-link perimeter fencing is in good condition; most of it was replaced in 2001. However, a portion of the fencing is only 4 feet high. Additionally, there is

some erosion under the fencing on the north side of the airport, which may inadvertently allow wildlife to access the airfield.

3.2.3 Facility Demand Forecasts

Historical aviation activity forecasts and planning documents were reviewed to evaluate forecasting trends and methodologies and to develop projections for future activity at MYF. Among the documents reviewed were the FAA Terminal Area Forecast (TAF), FAA Air Traffic Activity Data System (ATADS) and a variety of reports and studies that track aviation industry trends. In addition, local community plans were reviewed to understand potential socioeconomic factors that can affect airport planning. Presented below is a summary of the forecasts prepared for the AMP.

3.2.3.1 Aircraft Projections

Table 3-1, *Aircraft Operation Demand Forecast Summary*, provides data for both the baseline (2017) and forecasted number of aircraft based at the airport and the number of annual operations. Since an airport's operations comprise the total number of take-offs and landings for a 12-month period, this data provides an overall picture of airport use.

Table 3-1
AIRCRAFT OPERATION DEMAND FORECAST SUMMARY

	2017 (Baseline)	2022	2027	2032	2037
Based Aircraft	605	608	611	614	617
Annual Operations	201,631	206,517	211,521	216,647	221,896

Source: C&S Engineers, Inc. 2019

The aviation demand forecast can be broken down further by aircraft category. Aircraft categories are defined as a grouping of aircraft types that have similar characteristics. These categories include single-engine propeller, multi-engine propeller, turboprop, jet, military, and rotorcraft (helicopters). Each category was evaluated to determine specific growth rates over the 20-year planning period. The rates were based on a review of historical trends at MYF, conversations with airport management, and forecasting trends provided by the FAA Aerospace Forecast. Table 3-2, *Aircraft Operations Fleet Mix Forecast at MYF*, details the annual operations forecasts by aircraft type.

Table 3-2
AIRCRAFT OPERATIONS FLEET MIX FORECAST AT MYF

Fleet Mix Aircraft Type	Annual Growth Rate	2017	2022	2027	2032	2037
Single Engine	0.45-0.50%	167,351	170,989	174,455	177,939	181,484
Multi-Engine	0.13-0.15%	20,087	20,502	20,926	21,346	21,701
Turboprop	1.40%	4,081	4,165	4,251	4,336	4,423
Jet	2.30%	4,111	4,526	5,105	5,757	6,493
Military	-	904	904	904	904	904
Rotorcraft	1.60%	5,097	5,431	5,880	6,365	6,891
Total	0.48%	201,631	206,517	211,521	216,647	221,896

Source: C&S Engineers, Inc. 2019

3.2.3.2 Hangars

Aircraft operation demand and fleet mix forecasts affect landside operations, since these numbers provide a basis for planning of facilities to house and service aircraft and other support needs. As such, a hangar demand forecast was prepared for MYF and is presented in Table 3-3, *MYF Hangar Demand Summary*.

Table 3-3
MYF HANGAR DEMAND SUMMARY

	2017 (Baseline)	2022	2027	2032	2037
Conventional/ Box Hangar ¹ (SF)	235,000^{1,2}	183,400	184,600	184,600	185,800
T-hangar/Single-aircraft box hangar (SF)	334,000	364,000	364,000	368,200	369,600
Total Hangar Area (SF)	569,000	547,400	548,600	552,800	555,400

Source: C&S Engineers, Inc. 2019

¹ Includes only multi-aircraft box hangars.

² Aircraft maintenance hangars and the SDPD hangar were excluded from the total measurement.

SF = square feet

The results of the hangar demand analysis in Table 3-3 above indicate that MYF has sufficient conventional box hangar storage space available for the 20-year planning period but lacks adequate T-hangar storage space.

3.2.3.3 Apron Parking

Aircraft that are not stored in a hangar are parked in apron areas. Table 3-4, *Apron Area Demand Summary*, provides a summary of the forecasted demand for apron area space.

Table 3-4
APRON AREA DEMAND SUMMARY

	Existing Area (SY)¹	Estimate of Apron Area Needed (SY)			
		2022	2027	2032	2037
Itinerant Apron	20,000	38,000	38,800	40,000	41,200
Based Apron	40,000	40,200	40,400	40,600	40,600
Total Apron	60,000	78,200	79,200	80,600	81,800

Source: C&S Engineers 2019

¹ Existing apron areas were measured using aerial imagery and are approximate; taxilanes were not included in the measurements of the parking apron.

SY = square yard

As presented in Table 3-4, MYF will be experiencing a shortage of apron area space. If not addressed, the shortage will continue to grow to a deficit of 21,800 square yards of apron area space at the close of the planning period in 2037.

3.2.3.4 Terminal Building

As noted in Section 3.2.2.2, *Landside Facility Deficiencies*, there is an existing shortage of terminal building space at MYF. The methodology used to determine the terminal building facility requirements for general aviation airports is based on the number of airport users anticipated to use the facility during the design hour operations. The design hour is defined as the peak hour of an average day of the peak month. The design hour can be used to determine the number of passengers and pilots departing or arriving on an aircraft in an elapsed hour of a typical busy day (design day). Furthermore, conventional planning practices use a factor of 2.5 people (passengers and pilots) per peak-hour (design hour) and an area of 100 to 150 SF of space per person to determine the building size requirements to accommodate the peak-hour traffic. Due to MYF's size and current activity, 150 SF of space was used. See Table 3-5, *General Aviation Terminal Building Space Requirements*. As shown in Table 3-5, as demand increases throughout the 20-year planning period, this space shortage would continue to an eventual shortage of 6,350 SF. See Section 3.2.2.2 for existing deficiencies in the condition of the building.

Table 3-5
GENERAL AVIATION TERMINAL BUILDING SPACE REQUIREMENTS

Year	Design Hour Operations ¹	Peak-Hour Pilot & Passengers	Existing Facility Size (SF) ²	Terminal Size Required (SF)	Net Increase Needed (SF)
2017	55	138	16,600	20,700 ³	4,100
2022	57	143	16,600	21,450	4,850
2027	58	145	16,600	21,750	5,150
2032	60	150	16,600	22,500	5,900
2037	61	153	16,600	22,950	6,350

Source: C&S Engineers, Inc. 2019

¹ Assumes that the total itinerant operations remain 51 percent of the total operations throughout the planning period.

² Existing total square-footage of MYF terminal building and the FBOs' shared common areas is 16,600 SF (10,000 SF + 6,600 SF).

³ The calculated terminal size required using the existing design hour and peak-hour pilot and passenger factor.

SF = square feet

3.2.3.5 Other Support Facilities

In addition to the major landside facility components, hangars, apron areas, and the terminal building, several other support facilities are forecasted to require improvements to provide sufficient capacity to meet the needs of these facilities. For instance, should an expansion of hangar space or the terminal building occur, this future development may require an extension or upgrade of utilities to provide power, water, and wastewater services. Likewise, the current airfield electrical vault is at capacity. While it can accommodate the present demand, future development such as additional airfield lighting would require a replacement of the current vault with a vault that could meet the new demand. Similarly, the City Maintenance and Equipment Building is adequate to serve the present needs at MYF; however, congruent with future development, the building should be expanded and potentially relocated. Other landside facilities such as the ATCT, access circulation network, and parking were examined in the facilities demand forecast. They were determined to be sufficient under existing conditions, and adequate to support future demands as forecasted in the AMP. Lastly, while MYF is not required to provide aircraft rescue and firefighting services per 14 CFR

Part 139 Airport Certification, it is recommended that MYF continue to work with Local Fire Station 28 to provide these services throughout the planning period.

3.3 Airport Master Plan Objectives

The following specific objectives for the proposed AMP support the purpose of the AMP, to assist the City as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and, if necessary, will ultimately aid the lead agency in preparing findings and overriding considerations. The primary goals, recommendations, and objectives of the AMP are as follows:

1. Implement safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria.
2. Adapt to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies.
3. Accommodate regional demand for hangar, tie-down, and terminal building space utilizing phased implementation schedule for the proposed improvements.
4. Maintain a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities.
5. Preserve natural and historic resources within airport lands.

3.4 Airport Master Plan Components

As shown on Figure 3-1, the AMP would involve both landside and airside components. Some of these components are in direct response to existing needs as discussed in Section 3.2.2, Facility Deficiencies, and some of the components as discussed in Section 3.2.3, Facilities Demand Forecast, are in response to airport facility planning that has provided a framework to forecast the facility needs for the 20-year planning horizon.

Airside components proposed by the AMP include removal of pavement at the end of Runway 5 and Taxiway F, along with reconfigurations of several other taxiways (refer to Figure 3-1). Construction of new run-up areas is also proposed. The main airside improvement proposed is the removal of the Runway 28R displaced threshold that was put in place by City of San Diego Resolution R-280194 (passed in 1992).

The landside components include a hangar site within the westernmost portion of the airport. The AMP identifies up to 92 new hangars, as well as space for 48 new tie-down areas. A 6,400 SF expansion to the existing terminal building is proposed, along with other improvements such as a public viewing area (outside the fence line), and an unleaded fuel tank.

The airside and landside components are discussed in greater detail within the following discussions.

3.4.1 Airside Components

3.4.1.1 Removal of Runway 28R Displaced Threshold

The main airside improvement proposed is the removal of the Runway 28R displaced threshold which was intended to limit the size of aircraft capable of operating at MYF by reducing the amount of runway available when landing to the west. Upon approval of this component by the City and FAA, the threshold would be moved 1,199 feet from approximately the location of Taxiway B, eastward to Taxiway A (see Figure 3-1).

Analysis of the fleet mix at MYF found that many of the aircraft types Resolution R-280194 intended to limit are currently operating at MYF. These aircraft include the Citation Sovereign (30,775 pounds), the Citation III (22,000 pounds), and the Challenger 300 (38,850 pounds). These larger aircraft currently utilize an approach of circling and landing on Runway 10L so they can use the full 4,598 feet of landing distance on Runway 28R. Relocating the Runway 28R threshold would have several effects on airport operations which are important to note:

- **Runway Protection Zone Relocation** –The proposed Runway 28R threshold relocation would be considered a modification of the existing RPZ configuration, and therefore must be evaluated by the FAA for any risks associated with the new configuration.
- **Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR)** – The MALSR for Runway 28R would need to be relocated to accommodate the proposed threshold relocation. (see Figure 3-1).
- **Glideslope Equipment and Precision Approach Path Indicator (PAPI)** – Similar to the MALSR, the navigational aids (glideslope antenna and PAPI) which provide instrumented vertical and visual guidance (respectively) to pilots on approach would need to be relocated as part of removing the displaced threshold (see Figure 3-1).

3.4.1.2 Runway 5 Modifications

Airside improvements proposed by the AMP to increase safety at Runway 5/23 include removal of 390 feet of pavement at the end of Runway 5 as well as removal of portions of Taxiway F. This would allow hangar sites west of Runway 5 to become developable with up to 34 hangars. Currently, the areas designated for hangars are too close to the Runway 5 imaginary surfaces, a situation which precludes hangar construction.

Due to demolition of the portion of Taxiway F, which provides access to Runway 5 from Taxiway G, a new taxiway is proposed to the east as shown on Figure 3-1.

3.4.1.3 Taxiway Reconfigurations

The following improvements are recommended to comply with FAA-recommended pavement geometry and would alleviate the hotspot conditions and the area of concern along Taxiway A, as discussed in Sections 2.2.1.2 and 3.2.2.1 and illustrated in Figure 2-6 of this PEIR. A hotspot is an

area with increased risk of collisions or runway incursions due to the layout of taxiways and runways.

Hotspots

- **Hotspot 1** is at the intersection of Taxiways E and M. Improvements included as part of the AMP include demolition of Taxiway E. As the existing segmented circle/compass rose would be removed, the AMP proposes to create a new segmented circle at the new runup area along Taxiway C (as shown in Figure 3-1).
- **Hotspot 2** is located on Taxiway F between Runways 10L and 10R. No pavement improvements are proposed for this area as the AMP found that this hotspot can be remedied by adding lighting and pavement markings to provide pilots with cues about the Runway 10L threshold.
- **Hotspot 3** is at the intersection of Taxiway B and Taxiway H. A new 90-degree access from the apron to Taxiway H would be constructed.

Taxiway A

The proposed improvement includes the partial demolition of the existing hold bay, and new pavement would be constructed to expand the runup area and bring the taxiway geometry to current FAA design criteria, resulting in a new hold bay at Taxiway A with increased capacity.

3.4.1.4 Run-up Areas

The lack of pavement and markings on the hold bay located at Taxiway B and Taxiway H is nonstandard. In addition to the reconfigured hold bay at Taxiway A, the AMP proposes to construct a new hold bay located off of Taxiway H prior to reaching Taxiway B that would meet FAA design standards. The proposed hold bay would improve the safety of the airfield by allowing aircraft to bypass other aircraft that are performing run-ups or waiting for clearance from air traffic control. A new run-up area is also proposed off Taxiway C, southwest of the fire station, which would include a segmented circle/compass rose (see Figure 3-1).

3.4.2 Landside Components

3.4.2.1 Terminal Building

As detailed in Chapter 2.0, the terminal facility is a 10,000 -SF footprint multi-functional two-story building which was constructed in 1969. It has undergone several updates since its original construction in 1969; the most recent occurred in 2021.

In addition to this, there are two FBOs on the airfield with an estimated total common space area of 6,600 SF. Within the terminal demand analysis, this combined space was utilized, along with a modified itinerant design hour to calculate the required terminal space needed over the course of the planning period. Based on current activity at the Airport, approximately 20,700 SF should be dedicated to the terminal facility, meaning a deficit of just over 4,000 SF presently exists. Furthermore, the total projected terminal space required in the year 2037 is estimated to be 22,950

SF. Assuming the two FBO common spaces remain the same size, the City terminal space should be increased by approximately 6,400 SF, totaling approximately 16,400 SF (see Figure 3-1).

3.4.2.2 Hangar Sites

The AMP includes construction of up to 92 new hangars, as well as space for 48 new tie-down areas, within the westernmost portion of the airport, as shown in Figure 3-1. Some of the smaller hangars would be designed to meet a demand for luxury hangars. Implementation of several of the larger 75,000-SF hangars would require encroachment into the hotel leasehold.

Within the westernmost area of the Airport are three existing hangars: Buildings 6, 7, and 8. These hangars have been evaluated for their historic potential and have been determined to be eligible for listing in the San Diego Register of Historic Resources, the California Register of Historical Resources (CRHR), and the National Register of Historic Places (NRHP). These hangars would be retained in their current state as part of the AMP. Any maintenance, repairs, or stabilization to the historic hangars, while currently unplanned, would comply with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

3.4.2.3 Public Viewing Area

The AMP would include a designated viewing area where members of the public could view airport operations and aircraft. The viewing area would be located at a 12,000 SF site along Kearny Villa Road at the northwest portion of MYF. It would be outside of the secure fence line and is anticipated to include greenspace or a landscaped area with seating. The viewing area would be included as part of the planned Airport Loop, which is a pedestrian walkway identified in Kearny Mesa Community Plan (see Figure 3-1).

3.4.2.4 Unleaded AvGas Fuel Tank

In keeping with the City's commitment to sustainability and safety, unleaded aviation gasoline became available at the airport in 2024. The City recognized the need for a more environmentally friendly fuel option and endeavored to make UL94 available at MYF. This step is in alignment with the FAA's effort to transition away from leaded avgas. The fuel would be kept in a 1,000-gallon towable fuel bowser. A business at the airport would lease the equipment from the City and sell the fuel to aircraft with an approved supplemental type certificate.

3.4.2.5 Other Aeronautical Land Uses

An approximately 4.5-acre area adjacent to Aero Drive and Glenn H. Curtis Road would remain as an "Aeronautical" land use. While the specific land uses for this area have not yet been determined, it is anticipated that the uses would be consistent with the other landside aeronautical support facilities found at the airport and dependent on future aeronautical demand (see Figure 3-1).

3.4.2.6 Access, Circulation, and Parking

There are no improvements proposed for John J. Montgomery Drive itself, but the proposed expansion of the terminal building southward would cause a reconfiguration of the drop-off area south of the terminal building.

Similarly, no improvements are proposed for the secondary access which is provided via Aero Drive to Glenn H. Curtiss Road which terminates in a cul-de-sac at the National Air College building.

3.4.3 Components Excluded from the Project

As denoted by the green hatch on Figure 3-1, there are several areas of the airport that are subject to private leases which are not a part of the project being analyzed in this PEIR. These include areas marked as Coast Flight, Crownair Aviation, and Corporate Helicopters. Examples of existing tenants in these areas include FBOs such as Coast Aircraft, and others. Any future private projects that may be proposed within the green-hatched lease areas would be required to complete their own CEQA review as appropriate. In addition, the expansion of the SDFD station within Airport property is a separate San Diego project that is not a part of the project analyzed in this PEIR.

While these components are excluded from the project-specific analysis in the PEIR, they have been included as part of the cumulative analysis (see Chapter 6 of this PEIR for more discussion).

3.5 Airport Master Plan Phasing

The individual improvements proposed over the 20-year planning horizon of the AMP are broken down in three phases based on improvements included in the Airport Layout Plan. These are detailed in Table 3-6, *Airport Layout Plan Phasing*, and Figure 3-2, and are more generally described as follows:

- **Phase I Near-Term (0-5 years)** generally involves runway improvements and rehabilitation, reconfiguration of taxiways as described in Section 3.4.1.3, the new compass rose/run-up area, the unleaded avgas fuel tank, and the apron adjacent to the SDFD station.
- **Phase II Mid-Term (6-10 years)** consists generally of preventative maintenance on Runway 10L/28R, new pavement in the existing portable hangars area south of the Crownair Aviation leasehold, new hangars west of the Crownair Aviation leasehold, and fencing, lighting, and electrical upgrades in various parts of the airfield.
- **Phase III Long-Term (11-20 years)** includes several larger capital improvement projects such as the terminal expansion, new large box hangars north of the hotel, the public viewing area, the Runway 5 end demolition, and the removal of the Runway 28R Displaced Threshold and associated navigation improvements.

Figure 3-3, *Staging Areas and Access Routes*, shows where construction staging would occur and how the construction/demolition materials would be hauled to and from the various improvement areas.

**Table 3-6
AIRPORT LAYOUT PLAN PHASING**

Task #	Improvement Project
Phase I Near-Term 0 - 5 Years	
1-1	Runway 10L/28R grooving and marking
1-2	Runway 10R/28L, Taxiways B/C/F and Taxilane A rehabilitation, Taxiways E demolition, and compass calibration pad
1-3 ¹	Taxiways H/A/J/B rehabilitation; Runway 28L runup area improvements
1-4	Taxiway K and Terminal apron rehabilitation, and "No-Taxi" island
1-5	Coast Air leasehold development to include new box hangars
1-6 ²	Crownair leasehold development to include new box hangars
1-7 ²	Corporate Helicopters leasehold development to include new box hangars
1-8 ²	San Diego Fire Department development to include large box hangar and apron
1-9	Construct VSR between Taxilane P and Taxilane J. Close portion of VSR near Runway 28R end
1-10	Relocate segmented circle and wind cones out of safety areas
1-11	Avigation easements for Runway 28R existing approach runway protection zone
1-12 ²	Executive Airpark leasehold development to include FBO expansion and vehicle parking
1-13	Unleaded avgas fuel tank
1-14	Property to be released
Phase II Mid-Term 6 - 10 Years	
2-1	Preventative maintenance on section of Runway 10L/28R
2-2	Hangar area pavement
2-3	Construct hangars south of Taxiway G
2-4 ²	Executive Airpark leasehold development to include new hangars, tie-downs, wash rack, fuel tanks, solar panels on shade hangars, and vehicle parking.
2-5 ¹	Airfield lighting and electrical upgrades
2-6	Perimeter fencing improvements
2-7	Reserved for future aeronautical land uses
Phase III Long-Term 11 - 20 Years	
3-1 ¹	Runway 10L non-precision markings and avigation easements for future approach RPZ
3-2	Public viewing area
3-3	Terminal expansion
3-4 ¹	Runway 5 end relocation and new connector taxiways
3-5	Construct large conventional hangar
3-6	Runway 28R threshold relocation (Taxiway A fillet), reduce runway width to 100 feet, and avigation easements for future approach RPZ
3-7 ¹	Runway 28R threshold relocation – Navigational aids (glidescope equipment and PAPI) and MALSR relocation
3-8	New hangars in the Spiders area (north of the Four Points by Sheraton hotel)

¹ Nighttime construction proposed.

² These improvements are within the private leasehold and are excluded from the analysis within this PEIR.

Source: C&S Companies 2024

3.5.1 Construction

Details regarding construction equipment, activities, and duration are not available at the programmatic level. However, for the purposes of analysis within this PEIR, general assumptions have been developed for each phase of implementation of the project. Construction of the proposed improvements would generally include pavement-related construction activities and



hangar/building-related construction activities. Pavement-related construction activities would include runway grooving, runway and taxiway marking, preventative maintenance and rehabilitation, existing surface reconstruction, new surface construction, and pavement demolition. Approximate areas of work for these pavement-related construction activities are as follows:

- Runway grooving – 510,000 SF
- Maintenance and rehabilitation – 848,600 SF
- Existing surface reconstruction – 244,440 SF
- New surface construction – 2,312,700 SF
- Pavement Demolition – 35,190 SF

Anticipated equipment for the various construction phases is shown in Table 3-7, *Construction Equipment*.

**Table 3-7
CONSTRUCTION EQUIPMENT**

Phase	Equipment	Number
Pavement Construction		
Grooving	Grooving machine	1
	Tank truck	1
	Sweeper/scrubber	1
Marking	Blasting truck	1
	Marking machine	1
Preventative Maintenance and Rehabilitation	Crack sealing truck	1
	Concrete saw	1
	Tractor/loader/backhoe	1
	Paving equipment	1
	Roller	1
Existing Surface Reconstruction	Pavement milling machine	1
	Paving machine	1
	Paving equipment	1
	Roller	1
New Surface Construction	Rubber-tired dozer	1
	Grader	1
	Rubber-tired loader	1
	Paving machine	1
	Paving equipment	1
	Roller	1
Pavement Demolition	Concrete saw	1
	Rubber-tired dozer	1
	Excavator	1
	Rubber-tired loader	1
	Crushing machine	1
	Tractor/loader/backhoe	1

Phase	Equipment	Number
Hangar/Building Construction		
Hangar/Building Construction	Rubber-tired dozer	1
	Tractor/loader/backhoe	1
	Crane	1
	Forklift	1
	Aerial lift	1
	Welder	1
	Generator	1

3.6 Relationship to Local Land Use Plans

3.6.1 General Plan

The City's General Plan (General Plan), which was most recently updated in 2024, provides policy direction for future Community Plan Updates, discretionary project review, and implementation programs. The General Plan provides the Citywide vision and comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define the City as a whole. The community plans incorporate relevant policies from the General Plan, and provide a long-range, comprehensive policy framework and vision for growth and development in each community. The General Plan and community plans work together to establish the policy framework for growth and development throughout the City. Ultimately, development within the various community plans is regulated through a range of regulatory documents in addition to the community plans, including but not limited to, the General Plan, the SDMC, and the CAP.

3.6.2 Community Plans

The City of San Diego is broken up into various communities, each with their own planning group, community plans, and/or regulations. The Airport is referenced and potentially affected by the community plans of four surrounding neighborhoods: Kearny Mesa, Serra Mesa, Clairemont Mesa, and Tierrasanta.

3.6.2.1 Kearny Mesa Community Plan

The Kearny Mesa Community Plan Update was approved and the EIR was certified in 2020 (SCH No. 2018111024).

Kearny Mesa is a major employment area for the City and the region due to the concentration of office, industrial, and retail uses. Most of the Kearny Mesa community planning area is designated as Industrial and Business Parks to accommodate general industrial, business park, scientific research and development, and heavy commercial uses. Most areas of Kearny Mesa are currently made up of larger blocks or "superblocks" that were designed for vehicular traffic, consistent with its development as an industrial area in the City. There are also limited areas designated as residential land use. The latest Kearny Mesa Community Plan Update includes a new land use overlay for employment villages, which allows for a mix of commercial and residential uses.

The General Plan's Land Use Element identifies Kearny Mesa as one of the City's Subregional Employment Areas which is intended to target new growth of employment uses.

The community plan recognizes that while the Airport is technically within the boundaries of the Kearny Mesa community planning area, the Airport's land use policies are contained in its ALUCP. This community plan requires that any proposed development be reviewed for compatibility with both MYF and the Marine Corps Air Station Miramar, per the specifications in the ALUCP. The main concerns of the community include aircraft noise, approach patterns, crash hazards, and future airport expansion.

3.6.2.2 Serra Mesa Community Plan

While MYF does not fall within the limits of the Serra Mesa community planning area, arriving and departing aircraft pass overhead and thus the airport is discussed in the community plan. The concerns stated in the community plan include noise, approach patterns, and crash hazards. The community plan recognizes that while aircraft noise levels may not exceed federal and state recognized annoyance level standards, it is still an important issue to residents.

3.6.2.3 Clairemont Mesa Community Plan

The Clairemont Mesa Community Plan is similar to the Serra Mesa plan in that it is affected by MYF even though the airport is outside of the official community planning area. The main concerns of the community regarding the airport are noise and potential crash hazards. It refers to the MYF ALUCP for development regulations for both airport development and any development in the designated AIAs, which are areas where current or future airport-related noise, overflight, safety, and/or airspace protection factors may affect land uses or necessitate restrictions on those uses.

3.6.2.4 Tierrasanta Community Plan

The Tierrasanta community planning area is directly to the east of MYF (east of I-15) and is influenced by MYF in a manner similar to Serra Mesa, in that departing and arriving aircraft pass overhead. The main concerns of the community regarding the airport are noise and potential crash hazards.

3.7 Other Agency Approvals

The AMP is intended to guide the development of the Airport within the 20-year planning period (through 2037). Accordingly, while some of the proposed improvements are covered by this PEIR at a project level, others provide a template for future actions that are covered at a programmatic level of detail. For the latter actions, the analysis contained herein anticipates that future development would occur within the proposed project area and would be subject to applicable development regulations and requirements of the City, the AMP, and this PEIR. Future development within the proposed AMP area would involve subsequent approval of public and private development proposals through both ministerial and discretionary reviews in accordance with applicable federal, state, and local regulations, and proposed AMP policies. A non-inclusive list of discretionary actions that would occur as the AMP is implemented is shown in Table 3-8, *Potential Future Discretionary Actions Associated with the Proposed Project*.

Table 3-8
POTENTIAL FUTURE DISCRETIONARY ACTIONS ASSOCIATED WITH THE PROPOSED PROJECT

Agency	Discretionary Action/Approvals
County of San Diego	Because the ALUCP is based on the ALP most recently approved by the FAA, any changes to the ALP occurring as a result of the master planning process will be reviewed by the San Diego County Regional Airport Authority, acting as the designated Airport Land Use Commission (ALUC) for all airports within San Diego County, to review consistency with the ALUCP. Further, in compliance with Public Utilities Code Section 21676, the City will submit a copy of the AMP to the ALUC prior to approving the plan.
City of San Diego	Discretionary permits (e.g., Site Development Permits, Conditional Use Permits, Neighborhood Development Permits, Planned Development Permits, Conditional Use Permits, Neighborhood Use Permits)
	Water, sewer, and storm drain infrastructure and road improvements (public right-of-way permits)
	Street Vacations, Release of Irrevocable Offers of Dedication, and Dedications
State of California	The State Water Resources Control Board will review Water Quality Certification Determinations for Compliance with CWA Section 401
	CDFW approval of MHPA Boundary Line Adjustment and Minor Amendment to the VPHCP
Federal	The Federal Aviation Administration (FAA) reviews all elements of the AMP and is responsible for approving two of its elements: (1) the Terminal Area Forecast (TAF) and (2) the ALP. FAA approval of the TAF and ALP indicates that the FAA finds the proposed AMP development to be safe and efficient and that the ALP conforms to the FAA airport design standards. However, it is the responsibility of the City of San Diego – Airports Division to ensure consistencies with FAA processes.
	U.S. Army Corps of Engineers CWA Section 404 Permits
	USFWS Section 7 or 10(a) review
	USFWS approval of Minor Amendment to the VPHCP
Other	SDG&E/Public Utilities Commission approvals of power line relocations or undergrounding
	Caltrans for encroachment permits if necessary
	Regional Water Quality Control Board permits

4.0 REGULATORY FRAMEWORK

The regulatory framework applicable to each environmental resource area addressed in the environmental analysis chapter of this PEIR (Chapter 5.0, Sections 5.1 through 5.13) is included in this chapter.

4.1 Air Quality

4.1.1 Federal

4.1.1.1 Federal Clean Air Act/National Ambient Air Quality Standards

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to the health and welfare of the general public. The USEPA is responsible for enforcing the Federal Clean Air Act (CAA) of 1970 and its 1977 and 1990 Amendments. The CAA required the USEPA to establish NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for several criteria pollutants, including ozone, CO, SO₂, NO₂, respirable particulate matter (PM₁₀ and PM_{2.5}), and lead. Table 4-1, *Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for these pollutants.

**Table 4-1
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary ¹	Secondary ²
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	Same as Primary
PM _{2.5}	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
NO ₂	1 Hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	–
	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
SO ₂	1 Hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	24 Hour	0.04 ppm (105 µg/m ³)	0.14 ppm (367 µg/m ³)	–
Lead	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	Same as Primary

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary ¹	Secondary ²
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility $\geq$ 10 miles (0.07 per km – $\geq$ 30 miles for Lake Tahoe)	No Federal Standards	
Sulfates	24 Hour	25 $\mu\text{g}/\text{m}^3$		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 $\mu\text{g}/\text{m}^3$)		
Vinyl Chloride	24 Hour	0.01 ppm (26 $\mu\text{g}/\text{m}^3$)		

Source: CARB 2024

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

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

O₃: ozone; ppm: parts per million; $\mu\text{g}/\text{m}^3$: micrograms per cubic meter; PM₁₀: large particulate matter;

AAM: Annual Arithmetic Mean; PM_{2.5}: fine particulate matter; CO: carbon monoxide;

mg/m³: milligrams per cubic meter; NO₂: nitrogen dioxide; SO₂: sulfur dioxide; km: kilometer; –: No Standard.

4.1.2 State

4.1.2.1 California Clean Air Act/California Ambient Air Quality Standards

The USEPA allows states the option to develop different (stricter) standards on criteria pollutants. The State of California has developed the CAAQS and generally has set more stringent limits on the criteria pollutants (see Table 4-1). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (see Table 4-1). The California CAA, also known as the Sher Bill or California AB 2595, was signed into law on September 30, 1988, and became effective on January 1, 1989. The California CAA requires that air districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures.

CARB is the state regulatory agency with authority to enforce regulations to both achieve and maintain the NAAQS and CAAQS. SDAPCD is responsible for developing and implementing the rules and regulations designed to attain the NAAQS and CAAQS, as well as permitting new or modified sources, developing air quality management plans, and adopting and enforcing air pollution regulations for San Diego County.

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for the attainment and maintenance of the ambient air quality standards in the SDAB. The regional air quality plan for the NAAQS is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). The regional air quality plan for the CAAQS is SDAPCD's 2022 Regional Air Quality Strategy (RAQS; SDAPCD 2023). These plans address emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the NAAQS and CAAQS. Mobile sources are regulated by the USEPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and RAQS.

The Attainment Plan and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the local jurisdictions' general plans would be consistent with the Attainment Plan and RAQS.

4.1.2.2 Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or in serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different than the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

The Health and Safety Code (H&SC; §39655, subd. [a]) defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.” A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the CAA (42 USC Sec. 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (AB 1807: H&SC Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics “Hot Spots” Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The Children’s Environmental Health Protection Act, California SB 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children’s exposure to air pollutants. The act requires CARB to review its air quality standards from a children’s health perspective, evaluate the statewide air monitoring network, and

develop any additional air toxic control measures needed to protect children's health. Locally, toxic air pollutants are regulated through SDAPCD Regulation XII.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter and 90 percent of DPM is less than 2.5 microns in diameter (CARB 2025d). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a significant impact on California's population—it is estimated that about 70 percent of total known cancer risk related to air toxics in California is attributable to DPM (CARB 2025d).

4.1.3 Local

4.1.3.1 Regional Air Quality Strategy

The SDAPCD prepared the 1991/1992 RAQS in response to the requirements set forth in AB 2595. The draft was adopted, with amendments, on June 30, 1992. Attached, as part of the RAQS, are the Transportation Control Measures (TCMs) for the air quality plan prepared by SANDAG in accordance with AB 2595 and adopted by SANDAG on March 27, 1992, as Resolution Number 92-49 and Addendum. The required triennial updates of the RAQS and corresponding TCMs were adopted in 1995, 1998, 2001, 2004, 2009, 2016, with the most recent version adopted by the SDAPCD in 2022. The RAQS and TCMs set forth the steps needed to accomplish attainment of the CAAQS.

The California CAA requires areas that are designated non-attainment of CAAQS for ozone, CO, SO₂, or NO₂ to prepare and implement state plans to attain the standards by the earliest practicable date (H&SC Section 40911[a]). With the exception of state ozone standards, each of these standards has been attained in SDAB (SDAPCD 2023). Refer to Section 4.1.2.1 for additional discussion on the RAQS.

4.1.3.2 San Diego County Air Pollution Control District Rule 50 (Visible Emissions)

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

Visibility reduction is probably the most apparent symptom of air pollution. Visibility degradation is caused by the absorption and scattering of light by particles and gases in the atmosphere before it reaches the observer. As the number of fine particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range. Light absorption by gases and particles is sometimes the cause of discolorations in the atmosphere but usually does not contribute very

significantly to visibility degradation. Scattering by particulates impairs visibility much more readily. SDAPCD Rule 50 (Visible Emissions) sets emission limits based on the apparent density or opacity of the emissions using the Ringelmann scale.

4.1.3.3 San Diego County Air Pollution Control District Rule 51 (Nuisance)

SDAPCD Rule 51 prohibits emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. It is generally accepted that the considerable number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days.

4.1.3.4 San Diego County Air Pollution Control District Rule 55 (Fugitive Dust Control)

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

4.1.3.5 San Diego County Air Pollution Control District Rule 67.0.1 (Architectural Coatings)

Future development pursuant to the proposed AMP is required to comply with SDAPCD Rule 67.0.1 (Architectural Coatings) which sets the following standard:

- Non-residential interior/exterior coatings are to be less than or equal to 100 g/L

4.1.3.6 City of San Diego Municipal Code

The City's Off-Site Development Impact Regulations (SDMC Chapter 14, Article 2, Division 7) applies to development in any zone and provides standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. SDMC Section 142.0710 establishes that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

4.2 Biological Resources

4.2.1 Federal

4.2.1.1 Endangered Species Act

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

The USFWS designates critical habitat for endangered and threatened species. The ultimate goal is to restore healthy populations of listed species within their native habitats, so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the FESA, federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in the destruction or adverse modification of the critical habitat.

Sections 7 and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 generally describes a process of federal interagency consultation and issuance of a biological opinion and incidental take statement when federal actions may adversely affect listed species. Section 10(a) generally describes a process for preparation of a Habitat Conservation Plan and issuance of an incidental take permit.

4.2.1.2 Migratory Bird Treaty Act

Migratory bird species that are native to the United States or its territories are protected under the federal MBTA, as amended under the Migratory Bird Treaty Reform Act of 2004 (Federal Register [FR] Doc. 05-5127). The MBTA is generally protective of migratory birds. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season. In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests. The Migratory Bird Treaty Reform Act requires the USFWS to publish a list of all nonnative, human introduced bird species to which the MBTA does not apply, and an updated list was published in 2020. The 2020 update identifies species belonging to biological families referred to in treaties the MBTA implements but are not protected because their presence in the United States or its territories is solely the result of intentional or unintentional human-assisted introductions.

4.2.1.3 Clean Water Act

The USACE regulates impacts to waters of the U.S. under Section 404 of the CWA (33 USC 401 et seq.; 33 USC 1344; USC 1413; and Department of Defense, Department of the Army, Corps of Engineers 33 CFR Part 323). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. A federal CWA Section 404 Permit would be

required for a project to place fill in waters of the U.S. Projects impacting waters of the U.S. could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed individually based on the type of action, amount of fill, etc. Individual permits typically require substantial time (often longer than one year) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions. A CWA Section 401 Water Quality Certification administered by the RWQCB must be issued prior to issuance of a Section 404 Permit.

4.2.2 State

4.2.2.1 California Endangered Species Act

Similar to the FESA, the California Endangered Species Act (CESA) of 1970 provides protection to species considered threatened or endangered by the state of California (CFG Code, Section 2050 et seq.). The CESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

The CESA established that it is state policy to conserve, protect, restore, and enhance state endangered species and their habitats. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. The CESA authorizes that private entities may “take” plant or wildlife species listed as endangered or threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit if the CDFW certifies that the incidental take is consistent with CESA (CFG Code Section 2080.1[a]). For state-only listed species, Section 2081 of CFG Code authorizes the CDFW to issue an Incidental Take Permit for state listed threatened and endangered species if specific criteria are met. The City was issued a take permit for their adopted MSCP SAP pursuant to Section 2081.

4.2.2.2 California Fish and Game Code

The CFG Code provides specific protection and listing for several types of biological resources. Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

4.2.3 Local

4.2.3.1 Multiple Species Conservation Program

Refer to Section 4.8.3 for discussion of the MSCP, MHPA, and MHPA Land Use Adjacency Guidelines (LUAGs).

4.2.3.2 Vernal Pool Habitat Conservation Plan

In October 2019, the City completed the VPHCP (City 2019), which is a comprehensive plan to provide conservation of vernal pool habitats and seven sensitive species that do not have coverage under the City's MSCP SAP. The VPHCP encompasses the entire City and MSCP SAP coverage area of approximately 206,124 acres, and includes some lands owned by the City that are within unincorporated San Diego County (i.e., Cornerstone Lands which include water supply areas for the City). Some lands within the City limits not under City jurisdiction (e.g., school districts, water districts, federal and state lands, etc.) are not automatically covered by the VPHCP; however, those landowners can seek coverage under the VPHCP through a Certificate of Inclusion.

In addition to authorizing take of sensitive vernal pool species, the VPHCP serves to expand the City's MHPA, with a focus on the management and conservation of vernal pool habitats and their associated species, particularly the covered species of the VPHCP. The VPHCP is comprised of three Planning Units; north, central, and south. The AMP area is located within the central PU of the VPHCP.

The seven species covered under the VPHCP include five plants and two animals, as listed below. The AMP area has the potential to support four of the seven covered VPHCP species. Species known to be in the AMP area are indicated with **, as follows:

- Otay Mesa mint (*Pogogyne nudiuscula*); FE and state listed endangered (SE)
- San Diego mesa mint (*Pogogyne abramsii*); FE and SE**
- Spreading navarretia (*Navarretia fossalis*); FT**
- San Diego button-celery (*Eryngium aristulatum* var. *Parishii*); FE and SE**
- California Orcutt grass (*Orcuttia californica*); FE and SE
- Riverside fairy shrimp (*Streptocephalus woottoni*); FE
- San Diego fairy shrimp (*Branchinecta sandiegonensis*); FE**

As discussed in Section 4.2.7 of the VPHCP, federal aviation regulations require that the airport be maintained and operated in a manner that promotes the health, safety, and welfare of airport users, and the surrounding communities. As part of this mandate, the airport has required operations and standard activities that have the potential to impact covered species and/or vernal pool habitat. Table 4-7 of the VPHCP identifies these covered airport activities. Section 8.4.2 of the VPHCP identifies the Minor Amendment Process for the airport. The Minor Amendment Process would allow impacts to vernal pool habitat and VPHCP covered species located within the legal boundaries of the airport properties while meeting health and safety requirements of the airports. Approval of a Minor Amendment requires a project submittal by the Permittee to Wildlife Agencies for a

consistency determination with the VPHCP. The consistency determination would be based on the VPHCP; the VPMMP; funding for the required management, monitoring, and reporting activities; and the City's ESL and Biology Guidelines. If a project is consistent with the VPHCP, the Wildlife Agencies will provide a Letter of Concurrence and the project will proceed in accordance with the VPHCP.

4.2.3.3 City of San Diego Environmentally Sensitive Lands Regulations

ESL include sensitive biological resources such as MHPA, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2018) as outlined in the City's ESL Regulations (SDMC Chapter 14, Article 3, Division 1). Impacts to biological resources within and outside of the MHPA must comply with the City's ESL Regulations, which serve to implement standards and requirements of CEQA, the California Coastal Act, and the MSCP.

The purpose of the ESL Regulations is to "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands." The regulations require that development avoid impacts to certain sensitive biological resources as much as possible, including, but not limited to: MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal and state listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. In addition to protecting wetlands, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect wetland-associated functions and values. While a 100-foot buffer width is generally required in the coastal zone and recommended in areas outside the coastal zone, this width may be increased or decreased on a case-by-case basis in consultation with the City, CDFW, USACE, and USFWS (City 2018). Future development within the AMP area would be required to comply with all applicable City ESL Regulations.

4.2.3.4 Biology Guidelines

In September 1999, the City's Biology Guidelines, part of the City's Land Development Manual (LDM), were adopted to aid in the implementation and interpretation of the ESL Regulations (SDMC Chapter 14, Article 3, Division 1) and the OR-1-2 Zone (SDMC Chapter 13, Article 1, Division 2). The Guidelines were most recently updated in 2018. Section III of the Biology Guidelines serves as standards for the determination of impact and mitigation under CEQA and the California Coastal Act. The guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL Regulations.

4.2.3.5 City of San Diego General Plan

The General Plan presents goals and policies for biological resources in the Conservation Element, which aims to: protect and conserve the landforms, canyon lands, and open spaces; limit development of floodplains and sensitive biological areas, including wetlands, steep hillsides, canyons, and coastal lands; manage and/or minimize runoff, sedimentation, and erosion due to construction activity, in order to improve watershed management and water quality; manage wetland areas for natural flood control and preserve wetland areas; preserve areas within the MSCP

and implement the goals and policies of the City's MSCP SAP; support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values; and work with private, State, and federal organizations or people to implement an effective wetland management system.

4.3 Geology and Soils

4.3.1 State

4.3.1.1 Earthquake Fault Zoning Act (Alquist-Priolo Act)

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the Act, the State Geologist has established regulatory zones (known as Earthquake Fault Zones) around surface traces of active faults. These have been mapped for affected cities, including San Diego. Applications for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report, prepared by a geologist registered in the State of California, that is directed to the problem of potential surface fault displacement through a project site.

4.3.1.2 California Seismic Hazards Mapping Act

The California Seismic Hazards Mapping Act (PRC; Division 2, Chapter 7.8, Section 2690 et seq.) provides a statewide seismic hazard mapping and technical advisory program to assist local governments in protecting public health and safety relative to seismic hazards. The act provides direction and funding for the State Geologist to compile seismic hazard maps and to make those maps available to local governments. The Act, along with related standards in the Seismic Hazards Mapping Regulations (CCR Title 14, Division 2, Chapter 8, Article 10, Section 3270 et seq.), directs local governments to require the completion and review of appropriate geotechnical studies prior to approving development projects. These requirements are implemented on a local level through means such as general plan directives and regulatory ordinances.

4.3.1.3 California Building Code

The California Building Code (CBC; CCR Title 24, Part 2) encompasses a number of requirements related to geologic issues. Specifically, these include general provisions (Chapter 1); structural design, including soil and seismic loading (Chapters 16/16A); structural tests and special inspections, including seismic resistance (Chapters 17/17A); soils and foundations (Chapters 18/18A); concrete (Chapters 19/19A); masonry (Chapters 21/21A); wood, including consideration of seismic design categories (Chapter 23); construction safeguards (Chapter 33); and grading, including excavation, fill, drainage, and erosion control criteria (Appendix J). The CBC encompasses standards from other applicable sources, including the International Building Code, and American Society for Testing and Materials (ASTM) International, with appropriate amendments and modifications to reflect site-specific conditions and requirements in California.

4.3.2 Local

4.3.2.1 City of San Diego Seismic Safety Study

The San Diego Seismic Safety Study includes geologic hazards and fault maps of the City. Areas of the City are identified by geologic hazard category, which reflects the geologic hazard type and related risks. These are generalized maps, and site-specific geologic/geotechnical investigations may be necessary for proposed development or construction. SDMC Section 145.1803 describes when a geotechnical investigation is required, and City of San Diego Development Services Information Bulletin 515 describes the minimum submittal requirements for geotechnical and geological reports that may be required for development permits, subdivision approvals, or grading permits.

4.3.2.2 City of San Diego Land Development Code

The City's Land Development Code (LDC) sets forth the regulations that apply to the development of land in the City, and comprises Chapters 11, 12, 13, 14 and 15 of the SDMC. The LDC describes situations where grading permits are needed, which include: for grading within a 100-year floodplain or which changes the existing drainage pattern; for grading, geotechnical investigations, well drilling, or agricultural activity on ESL or on properties with historical resources; for any activity that disturbs soil or vegetation in ESL; if grading is being performed as a condition of a development permit or for restoring damage caused by illegal grading; if the grading is within privately owned open space easements or City-owned open space; for modification of slope on a canyon or excavation of a hillside; for grading of any nonenvironmentally sensitive land of one acre or more; or for fill with more than five percent broken concrete, asphalt, masonry or construction debris, or with any single piece larger than 12 inches in any direction.

4.3.2.3 City of San Diego Building Regulations

The City's Building Regulations (Chapter 14, Article 5) are intended to regulate the construction of applicable facilities and encompasses (and formally adopts) associated elements of the CBC. Specifically, this includes guidelines regulating the "construction, alteration, replacement, repair, maintenance, moving, removal, demolition, occupancy, and use of any privately owned building or structure or any appurtenances connected or attached to such buildings or structures within this jurisdiction, except work located primarily in a public way, public utility towers and poles, mechanical equipment not specifically regulated in the Building Code, and hydraulic flood control structures."

4.3.2.4 General Plan Public Facilities, Services, and Safety Element

The Public Facilities, Services and Safety Element of the City General Plan (City 2024a) identifies a number of applicable policies related to seismic, geologic, and structural considerations. Specifically, Policies PF-Q.1 and PF-Q.2 include measures regarding conformance with State laws related to seismic and geologic hazards, conducting/reviewing geotechnical investigations, and maintaining structural integrity with respect to geologic hazards.

4.4 Greenhouse Gas Emissions

4.4.1 Federal

4.4.1.1 Federal Clean Air Act

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that carbon dioxide (CO₂) is an air pollutant, as defined under the CAA, and that the USEPA has the authority to regulate emissions of GHGs. The USEPA announced that GHGs (including CO₂, methane [CH₄], nitrous oxide [N₂O], hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [SF₆]) threaten the public health and welfare of the American people. This action was a prerequisite to finalizing the USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and Department of Transportation's (DOT's) National Highway Traffic Safety Administration (NHTSA) on September 15, 2009.

4.4.1.2 Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the NHTSA worked together on developing a national program of regulations to reduce GHG emissions and improve fuel economy of light-duty vehicles. The USEPA established the first-ever national GHG emissions standards under the CAA, and the NHTSA established Corporate Average Fuel Economy standards under the Energy Policy and Conservation Act. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking that established standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. In March 2022, the agencies finalized standards for model years 2024 through 2026 and established an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026 (NHTSA 2022).

4.4.1.3 United States Aviation Climate Action Plan

On November 9, 2021, FAA published the United States Aviation CAP, which describes a whole-of-government approach to put the sector on a path toward achieving net-zero emissions by 2050. The plan builds on individual and sector-wide commitments announced by the U.S. aviation industry and highlights specific actions and policy measures to foster innovation and drive change across the entire U.S. aviation sector.

The actions identified in the Plan will decrease emissions through:

- Development of new, more efficient aircraft and engine technologies
- Improvements in aircraft operations throughout the National Airspace System
- Production and use of Sustainable Aviation Fuels
- Electrification and, potentially hydrogen, as solutions for short-haul aviation
- Advancements in airport operations across the U.S.
- International initiatives such as the airplane CO₂ standard and the Carbon Offsetting and Reduction Scheme for International Aviation

- Support for research into climate science

4.4.2 State

The State of California has adopted a number of plans and regulations aimed at identifying statewide and regional GHG emissions caps, GHG emissions reduction targets, and actions and timelines to achieve the target GHG reductions.

4.4.2.1 Executive Order S-3-05

On June 1, 2005, Executive Order (EO) S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

4.4.2.2 Assembly Bill 32 – Global Warming Solution Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed by AB 32 to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

4.4.2.3 Executive Order B-30-15

On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28 nation European Union. California is on track to meet or exceed the target of reducing GHGs emissions to 1990 levels by 2020, as established in AB 32. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

4.4.2.4 Senate Bill 32

Senate Bill (SB) 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the H&SC Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

4.4.2.5 Assembly Bill 197

A condition of approval for SB 32 was the passage of AB 197. AB 197 requires that CARB consider the social costs of GHG emissions and prioritize direct reductions in GHG emissions at mobile sources and large stationary sources. AB 197 also gives the California legislature more oversight over CARB through the addition of two legislatively appointed members to the CARB Board and the establishment a legislative committee to make recommendations about CARB programs to the legislature.

4.4.2.6 Assembly Bill 1493 – Vehicular Emissions of Greenhouse Gases

AB 1493 (Pavley) requires that CARB develop and adopt regulations that achieve “the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State.” On September 24, 2009, CARB adopted amendments to the Pavley regulations that intend to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California’s enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance flexibility. In January 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single packet of standards called Advanced Clean Cars (CARB 2025b).

4.4.2.7 Assembly Bill 341

The state legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 requires all businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. The final regulation was approved by the Office of Administrative Law on May 7, 2012, and went into effect on July 1, 2012.

4.4.2.8 Executive Order S-01-07

This EO, signed by Governor Schwarzenegger on January 18, 2007, directs that a statewide goal be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by the year 2020. It orders that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California and directs CARB to determine whether a LCFS can be adopted as a discrete early action measure pursuant to AB 32. CARB approved the LCFS as a discrete early action item with a regulation adopted and implemented in April 2010. Although challenged in 2011, the Ninth Circuit reversed the District Court’s opinion and rejected arguments that implementing LCFS violates the interstate commerce clause in September 2013. CARB is therefore continuing to implement the LCFS statewide.

4.4.2.9 Senate Bill 350

Approved by Governor Brown on October 7, 2015, SB 350 increases California’s renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how

each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy.

4.4.2.10 Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPOs). CARB periodically reviews and updates the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy (APS) to meet the targets. The APS is not a part of the RTP. Qualified projects consistent with an approved SCS or APS categorized as "transit priority projects" would receive incentives to streamline CEQA processing.

4.4.2.11 Senate Bill 100

Approved by Governor Brown on September 10, 2018, SB 100 extends the renewable electricity procurement goals and requirements of SB 350. SB 100 requires that all retail sales of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

4.4.2.12 Executive Order N-79-20

EO N-79-20, signed by Governor Newsom on September 23, 2020, establishes three goals for the implementation of zero emissions vehicles in California: first, 100 percent of in-state sales of new passenger cars and trucks will be zero-emissions by 2035; second, 100 percent of medium- and heavy-duty vehicles in the state will be zero-emissions vehicles by 2045 for all operations where feasible, and by 2035 for drayage trucks; and third, 100 percent of off-road vehicles and equipment will be zero emissions by 2035 where feasible.

4.4.2.13 Assembly Bill 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, the California Climate Crisis Act, declares the policy of the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions,

removal of CO₂ from the atmosphere (carbon capture), and an almost complete transition away from fossil fuels.

4.4.2.14 Senate Bill 905

Approved by Governor Newsom on September 16, 2022, SB 905, Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage Program, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO₂ removal technologies and facilitate the capture and sequestration of CO₂ from those technologies, where appropriate. SB 905 is an integral part of achieving the state policies mandated in AB 1279.

4.4.2.15 Climate Change Scoping Plan

The Climate Change Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across California's society and economy to reduce emissions and reach climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG emission targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in SLCPs; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

4.4.2.16 California Code of Regulations, Title 24, Part 6

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions.

The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards became effective on January 1, 2023. The 2022 update to the Building Energy Efficiency

Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. New for the 2022 Title 24 standards are non-residential on-site PV (solar panels) electricity generation requirements (California Energy Commission 2022). The 2025 Title 24 standards will become effective on January 1, 2026. For non-residential buildings, the 2025 update to the Building Energy Efficiency Standards increases efficiency requirements for HVAC systems, encourages expanded use of heat pumps, establishes electric-ready requirements for commercial kitchens, and updates photovoltaic and battery energy storage standards (California Energy Commission 2025).

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

4.4.2.17 California Code of Regulations, Title 24, Part 11

CCR Title 24, Part 11: The California Green Building Standards Code (CALGreen) is a code with mandatory requirements for all nonresidential buildings (including industrial buildings) and residential buildings for which no other state agency has the authority to adopt green building standards. CALGreen also contains voluntary measures (i.e., Tier 1, Tier 2) which exceed minimum regulatory requirements. The 2022 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings became effective on January 1, 2023 (California Building Standards Commission [CBSC] 2022). The 2025 CALGreen standards will become effective on January 1, 2026. At the time of this analysis, the 2025 CALGreen standards had not been published.

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

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

4.4.3 Local

4.4.3.1 San Diego Forward: The Regional Plan

SANDAG's 2021 Regional Plan (Regional Plan) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The underlying purpose is to provide direction and guidance on future regional growth (i.e.,

the location of new residential and non-residential land uses) and transportation patterns throughout the region. The 2021 Regional Plan is a 30-year plan that considers how the community will grow, where residents will live, and how residents and visitors will move around the region. It combines the RTP, SCS, and Regional Comprehensive Plan. As such, the 2021 Regional Plan must comply with specific state and federal mandates. These include an SCS, per SB 375, that achieves GHG emissions reduction targets set by the CARB; compliance with federal civil rights requirements (Title VI); environmental justice considerations; air quality conformity; and public participation (San Diego Association of Governments [SANDAG] 2021).

4.4.3.2 City of San Diego General Plan

The General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth” related to climate change. The Land Use and Community Planning Element; the Mobility Element; the Urban Design Element; and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

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

4.4.3.3 Climate Action Plan

A CAP was adopted by the City Council in December 2015. The CAP quantifies existing GHG emissions as well as projected emissions for the years 2030 and 2035 resulting from activities within the City’s jurisdiction. The CAP also identifies City target emissions levels, below which the Citywide GHG impacts would be less than significant. The CAP and the accompanying certified Final EIR also identify and analyze the GHG emissions that would result from the business-as-usual scenario for the years 2030 and 2035. The CAP includes a monitoring and reporting program to ensure its progress toward achieving the specified GHG emission reductions and specifies actions that, if implemented, would achieve the specified GHG emission reductions targets. In 2015, the CAP was adopted in a public process following certification of Final EIR SCH No. 2015021053 (City 2015). After the adoption of the CAP, the City also established additional specific measures (CAP Consistency Checklist) that, if implemented on a project-by-project basis, would further ensure that the City achieves the specified GHG emission reduction targets in the CAP.

On August 2, 2022, the City Council adopted an update to the CAP (2022 CAP), in a public process following certification of the Second Addendum to Final EIR SCH No. 2015021053 (City 2022b). As proposed in the 2022 CAP, in October 2022, the City Council approved an amendment to the LDC (SDMC Chapter 14, Article 3, Division 14), which established the CAP Consistency Regulations. The CAP Consistency Regulations replaced the CAP Consistency Checklist as the measures that could be implemented on a project-by-project basis pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Projects for new development that are consistent with the CAP, as determined through compliance with the CAP Consistency Regulations, may rely on the CAP for the cumulative impact analysis of GHG emissions (City 2022d).

4.5 Historical, Archaeological, and Tribal Cultural Resources

4.5.1 Federal

4.5.1.1 National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act (NHPA) of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in 36 CFR 60. A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

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

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property.

Integrity is the ability of a property to convey its significance. Within the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity as defined below:

- Location: The place where the historic property was constructed or the place where the historic event occurred.
- Setting: The physical environment of a historic property.
- Design: The combination of elements that create the form, plan, space, structure, and style of a property.
- Materials: The physical elements that were combined or deposited during a particular period of time and in a pattern or configuration or form a historic property.
- Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling: The property's expression of the aesthetic or historic sense of a particular period of time.
- Association: The direct link between an important historic event or person and a historic property.

4.5.1.2 Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of project evaluation.

4.5.2 State

4.5.2.1 California Register of Historic Resources/California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one which qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under PRC Section 5024.1(g). A resource that is not listed in, or determined to be eligible for listing in, the CRHR, is not included in a local register of historic resources, or is not deemed significant in a historical resource survey may nonetheless be deemed historically significant by a CEQA lead agency (CEQA Guidelines Section 15064.5 and CEQA Statute Section 21083.2).

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. State criteria are those listed in CEQA and used to determine whether a historic resource qualifies for the CRHR. A resource may be listed in the CRHR if it is significant at the federal, state, or local level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States;
2. It is associated with the lives of persons important to the nation or to California's past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. It has yielded, or may be likely to yield, information important in prehistory or history of the state or nation.

As indicated above, the California criteria (CEQA Guidelines Section 15065.5) for the registration of significant architectural, archaeological, and historical resources in the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a "unique" resource based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Having a special and particular quality such as being the oldest or best available example of its type.
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR, as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

CEQA was amended in 1998 to define "historical resources" as: a resource listed in or determined eligible for listing on the CRHR; a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements; and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant.

The City's determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines. Archaeological resources are considered "historical resources" for the purposes of CEQA. Most archaeological sites which qualify for the CRHR do so under criterion 4 (i.e., research potential).

Since resources that are not listed or determined eligible for the state or local registers may still be historically significant; their significance would be determined if they are affected by a development proposal. The significance of a historical resource under criterion 4 rests on its ability to address important research questions.

4.5.2.2 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (CAL-NAGPRA; 2001), like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations.

4.5.2.3 California Health and Safety Code Section 7050.5

California H&SC Section 7050.5 and CEQA Guidelines Section 15064.5 state that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification.

4.5.2.4 California Public Resources Code Section 5097.98

PRC Section 5097.98 and CEQA Guidelines Section 15064.5 state that the NAHC, upon notification of the discovery of Native American human remains pursuant to California H&SC Section 7050.5, shall immediately notify those persons that it believes to be descended from the deceased (i.e., the most likely descendant [MLD]). With permission of the landowner or an authorized representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

4.5.2.5 Senate Bill 18

Native American involvement in the planning and development review process is addressed by several state laws. The most notable of the state laws is SB 18, which includes detailed requirements for local agencies to consult with identified California Native American Tribes early in the planning and/or development process.

4.5.2.6 Assembly Bill 52

AB 52 (Chapter 532, Statutes of 2014) was passed on September 25, 2014, and applies to all projects that file an NOP or Notice of Intent to Adopt a negative declaration, mitigated negative declaration or EIR, on or after July 1, 2015. The bill requires that a lead agency begin consultation with a California Native American tribe that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency, prior to the determination of whether a negative declaration, mitigated negative declaration, or EIR will be prepared. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

AB 52 codified this consultation process within the CEQA statute (PRC Section 20174). It also defines tribal cultural resources as either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.5.3 Local

4.5.3.1 City of San Diego Municipal Code: Historical Resources Regulations

In January 2000, the City's Historical Resources Regulations, part of the SDMC (Sections 143.0201-143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners. The Historical Resources Regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and Section 106 of the NHPA of 1966. Historical resources, in the context of the City's Historical Resources Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use.

The City's Historical Resources Guidelines are part of the City's LDM and set up a development review process to guide review of projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

Section 143.0212(b) of the Historical Resources Regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing historic or prehistoric archaeological sites. These maps are based on records contained in the California Historical Resources Information System (CHRIS), on file at the South Coastal Information Center (SCIC) at San Diego State University (SDSU) and the San Diego Museum of Us, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known

resource is recorded on the parcel or within a one-mile radius, if a qualified consultant or knowledgeable City staff member recommends it, or if more than five years have elapsed since the last survey and the potential for archaeological resources exists. A historic property (built environment) survey is required if the structure/site is over 45 years old; may meet one or more criteria for designation; and appears to have integrity of setting, design, materials, workmanship, feeling, and association.

Section 143.0212(d) of the Historic Resources Regulations states that if a property-specific survey is required, it shall be conducted according to the Historical Resources Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located. If the survey results are negative, the review process is complete and no mitigation is required.

In addition to direct and indirect impacts, cumulative impacts must also be addressed during the CEQA review process. Cumulative impacts are a result of individually minor but collectively significant projects occurring over a period of time. Data recovery may be considered a cumulative impact due to the loss of a portion of the resource database. Cumulative impacts also occur in districts when several minor changes to contributing properties, their setting, or landscaping eventually results in a significant loss of integrity.

4.5.3.2 Historical Resources Register

Compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated as historic by the City Historical Resources Board if it meets any of the following criteria":

- A. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- B. Is identified with persons or events significant in local, state, or national history;
- C. Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;
- E. Is listed on or has been determined eligible by the National Park Service for listing on the NRHP or is listed or has been determined eligible by the California Office of Historic Preservation (OHP) for listing on the State Register of Historical Resources; or
- F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the City.

Historical resources determined to be significant/important must either be avoided or, for archaeological resources, a data recovery program for important archaeological sites must be developed and approved prior to permit issuance to assure adequate mitigation for the recovery of cultural and scientific information related to the resource's significance/importance.

4.5.3.3 City of San Diego General Plan

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the Historical Resources Board (HRB), the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The Historic Preservation Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

General Plan Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within the City's land use plans. These policies also focus on coordinated planning and preservation of tribal resources, including promoting the relationship with Kumeyaay/Diegueño tribes. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through cultural heritage tourism.

4.6 Human Health, Public Safety, and Hazardous Materials

4.6.1 Federal

The USEPA is the primary federal agency regulating hazardous wastes and materials. The USEPA broadly defines a hazardous waste as one that is specifically listed in the USEPA regulations, has been tested, and meets one of the four characteristics established by the USEPA (toxicity, ignitability, corrosiveness, and reactivity), or that has been declared hazardous by the generator based on its knowledge of the waste. The USEPA defines hazardous materials as any item or chemical that can cause harm to people, plants, or animals when released by spilling, leaking, pumping, pouring, emptying, discharging, injecting, leaching, dumping, or disposing into the environment. Federal regulations pertaining to hazardous wastes and materials are generally contained in Titles 29, 40, and 49 of the CFR, which are discussed herein.

4.6.1.1 Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (RCRA; 42 USC Sections 6901–6987), including the Hazardous and Solid Waste Amendments of 1984, protects human health and the environment, and imposes regulations on hazardous waste generators, transporters, and operators of treatment,

storage, and disposal facilities. The Hazardous and Solid Waste Amendments also requires USEPA to establish a comprehensive regulatory program for underground storage tanks. The corresponding regulations in 40 CFR 260–299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste.

4.6.1.2 Hazardous Materials Transportation Act

The DOT, the Federal Highway Administration, and the Federal Railroad Administration are the three entities that regulate the transport of hazardous materials at the federal level. The Hazardous Materials Transportation Act (49 CFR 171, Subchapter C) governs the transportation of hazardous materials. These regulations are promulgated by DOT and enforced by USEPA.

4.6.1.3 Comprehensive Environmental Response, Compensation, and Liability Act

The 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the Superfund Act, provides federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Federal actions related to CERCLA are limited to sites on the National Priorities List for cleanup activities, with National Priorities List listings based on the USEPA Hazard Ranking System (HRS). The HRS is a numerical ranking system used to screen potential sites based on criteria such as the likelihood and nature of the hazardous material release, and the potential to affect people or environmental resources. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986.

The SARA is primarily intended to address the emergency management of accidental releases, and to establish state and local emergency planning committees responsible for collecting hazardous material inventory, handling, and transportation data. Specifically, under Title III of SARA, a nationwide emergency planning and response program established reporting requirements for businesses that store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under federal laws. Title III of SARA also requires each state to implement a comprehensive system to inform federal authorities, local agencies, and the public when significant quantities of hazardous or acutely toxic substances are stored or handled at a facility. This data is made available to the community at large under the “right-to-know” provision, with SARA also requiring annual reporting of continuous emissions and accidental releases of specified compounds.

4.6.2 State

4.6.2.1 California Code of Regulations

Most state and federal regulations and requirements that apply to generators of hazardous waste are codified in CCR Title 22, Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generation, transportation, treatment, storage, and disposal facilities. Because California is a fully authorized state under RCRA, most RCRA regulations are integrated into Title 22. The CalEPA/California Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the USEPA through Title 22, which does not include as many exemptions or

exclusions as the equivalent federal regulations. Similar to the California H&SC, Title 22 also regulates a wider range of waste types and waste management activities than RCRA. The state has compiled a number of additional regulations from various CCR titles related to hazardous materials, wastes, and toxics into CCR Title 26 (Toxics), and provides additional related guidance in Titles 23 (Waters) and 27 (Environmental Protection), although California hazardous waste regulations are still commonly referred to as Title 22.

Title 24 of the CCR provides a number of requirements related to fire safety, including applicable elements of Part 2, the CBC; Part 2.5, the California Residential Code (CRC); and Part 9, the California Fire Code (CFC). Specifically, CBC Chapter 7 (Fire and Smoke Protection Features) includes standards related to building materials, systems, and assembly methods to provide fire resistance and prevent the internal and external spreading of fire and smoke (such as the use of non-combustible materials and fire/ember/smoke barriers). CBC Chapter 9 (Fire Protection Systems) provides standards regarding when fire protection systems (such as alarms and automatic sprinklers) are required, as well as criteria for their design, installation, and operation. Section R327 of the CRC includes measures to identify Fire Hazard Severity Zones and assign agency responsibility (i.e., federal, state, and Local Responsibility Areas, refer to the discussion below under CAL FIRE), and provides fire-related standards for building design, materials, and treatments. The CFC establishes minimum standards to safeguard public health and safety from hazards including fire in new and existing structures. Specifically, this includes requirements related to fire hazards from building use/occupancy (e.g., access for fire-fighting equipment/personnel and the provision of water supplies), the installation or alteration/ removal of fire suppression or alarm systems, and the management of vegetative fuels and the provision of defensible space.

4.6.2.2 Hazardous Materials Release Response Plans and Inventory

Two programs in H&SC Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Prevention (CalARP) program. The County DEH is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazards substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulations. Congress requires USEPA Region 9 to make Risk Management Plan information available to the public through USEPA's Envirofacts Data Warehouse. The Envirofacts Data Warehouse is considered the single point of access to select USEPA environmental data. California H&SC Section 25270, Aboveground Petroleum Storage Act, requires registration and spill prevention programs for ASTs that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs implemented by the RWQCBs and the State Water Resources Control Board (SWRCB).

4.6.2.3 Emergency Response to Hazardous Materials Incidents

California has developed the State of California Emergency Plan (California Governor's Office of Emergency Services 2017) to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous material incidents is one part of this plan. The plan is managed by the California Governor's Office of Emergency Services (formerly the California Emergency Management Agency), which coordinates the responses of other agencies,

including CalEPA, the California Highway Patrol, CDFW, and RWQCB. A 2024 update to the State Emergency Response Plan is currently being prepared.

4.6.2.4 California Department of Toxic Substances Control

Within CalEPA, the DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the state agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law. Since August 1, 1992, DTSC has been authorized to implement the state's hazardous waste management program for CalEPA.

DTSC is responsible for compiling a list of hazardous materials sites pursuant to Government Code Section 65962.5, which includes five categories:

- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the H&SC;
- Land designated as "hazardous waste property" or "border zone property";
- Properties with hazardous waste disposals on public land;
- Hazardous substance release sites selected for (and subject to) a response action; and
- Sites included in the Abandoned Site Assessment Program.

4.6.2.5 CalEPA's Unified Program

In 1993, SB 1082 gave CalEPA the authority and responsibility to establish a unified hazardous waste and hazardous materials management and regulatory program, commonly referred to as the Unified Program. The purpose of this program is to consolidate and coordinate six different hazardous materials and hazardous waste programs, and to ensure that they are consistently implemented throughout the state. CalEPA oversees the Unified Program with support from DTSC, RWQCBs, the San Diego County Office of Emergency Services, and the State Fire Marshal.

State law requires county and local agencies to implement the Unified Program. The agency in charge of implementing the program is called the Certified Unified Program Agency (CUPA). The County of San Diego DEH, Hazardous Materials Division, is the designated CUPA for the county. In addition to the CUPA, other local agencies help to implement the Unified Program. These agencies are called Participatory Agencies. The Hazardous Materials Division (HMD) is the Participatory Agency for San Diego County.

4.6.3 Local

4.6.3.1 County of San Diego Department of Environmental Health

The HMD of DEH regulates hazardous waste and tiered permitting, USTs, aboveground petroleum storage and risk management plans, hazardous materials business plans and chemical inventory, and medical waste. The HMD's goal is "to protect human health and the environment by ensuring

that hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed.”

4.6.3.2 San Diego County Multi-Jurisdictional Hazard Mitigation Plan

Long-term prevention, mitigation efforts, and risk-based preparedness for specific hazards within San Diego are addressed as a part of the 2023 San Diego County MHMP, which was adopted in February 2023. It is intended to enhance public awareness, help serve as a decision-making tool, promote compliance with state and federal requirements, supplement local policies regarding disaster planning, and improve multi-jurisdictional coordination. The MHMP identifies specific risks for San Diego County and provides methods to help minimize damage caused by natural and man-made disasters. The list of hazards profiled for San Diego County include climate change; sea level rise/coastal storms; erosion; dam failure; earthquake/liquefaction; flood; rain-induced landslide; wildfire; extreme heat; drought; severe winter weather; and terrorism/cyberterrorism.

4.6.3.3 San Diego County Operational Area Emergency Plan

The 2022 San Diego County Operational Area Emergency Plan describes a comprehensive emergency management system, which provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

4.6.3.4 City of San Diego Municipal Code

Hazardous Materials

The Hazardous Waste Establishment section of the SDMC (SDMC Chapter 4, Article 2, Division 8) enables the Health Officer to establish a program to monitor establishments where hazardous wastes are produced, stored, handled, disposed of, treated, or recycled, and to provide health care information and other appropriate technical assistance on a 24-hour basis to emergency responders in the event of a hazardous waste incident involving community exposure. The Disclosure of Hazardous Materials section (SDMC Chapter 4, Article 2, Division 9) establishes a system for the provision of information on potential hazards or hazardous materials in the community, including appropriate education and training for use of information. Elements of the system include the Health Officer's ability to seek advice from the Hazardous Materials Advisory Committee, the filing of a hazardous substance disclosure form, the content of the disclosure form, emergency response information, and penalty for violations.

Airport Land Use Compatibility Zone

The SDMC addresses issues related to safety compatibility in the Airport Land Use Compatibility Overlay Zone. SDMC Chapter 13 Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for MCAS Miramar, Montgomery-Gibbs Executive Airport, Brown Field, and Gillespie Airport is compatible with respect

to airport-related noise, public safety, airspace protection, and aircraft overflight areas. Regulations include safety compatibility and aircraft overflight notification.

Brush Management

The City's Brush Management Regulations (SDMC Section 142.0412) are intended to minimize wildland fire hazards through prevention activities and programs. These regulations require the provision of mandatory setbacks, irrigation systems, regulated planting areas, and plant maintenance in specific zones, and are implemented at the project level through the grading and building permit process.

Brush management is required in all base zones on publicly or privately-owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires Brush Management Plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City Fire Marshal, the brush management plans for all future development would consist of two separate and distinct zones as follows:

- Zone One consists of the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone is not allowed on slopes with a gradient greater than 4:1.
- Zone Two consists of the area between Zone One and any area of native or non-irrigated vegetation and consists of thinned native or naturalized vegetation.

4.6.3.5 City of San Diego General Plan

The General Plan presents goals and policies relating to hazardous materials and disaster preparedness in the Public Facilities, Services, and Safety Element.

4.6.3.6 Airport Land Use Compatibility Plans

Refer to Section 4.8.3.10 for discussion of ALUCPs.

4.7 Hydrology/Water Quality

4.7.1 Federal

4.7.1.1 Clean Water Act

The CWA (33 USC Section 1251 et seq.; 1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into waters of the United States and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA.

Section 401 of the CWA requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the CWA established the NPDES to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters of the United States. In California, the SWRCB and RWQCBs administer the NPDES permitting programs and are responsible for developing waste discharge requirements. Each local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects or recommendations contained within the proposed AMP include the SWRCB Construction General Permit and Industrial General Permit and the regional MS4 Permit administered by the RWQCB.

Under Section 303(d) of the CWA, states, territories, and authorized tribes are required to develop lists of impaired waters. These are waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop TMDLs for these waters. A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

4.7.1.2 Executive Order 11988, Floodplain Management

The major requirements of this EO are to avoid support of floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program (NFIP). The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and the location of development to less flood-prone areas.

4.7.1.3 National Flood Insurance Program

The NFIP is a federal program enabling property owners in participating communities to purchase insurance protection against losses from flooding. In support of the NFIP, FEMA identifies flood hazard areas throughout the United States and its territories by producing Flood Hazard Boundary Maps, Flood Insurance Rate Maps, and Flood Boundary & Floodway Maps. Several areas of flood hazards are commonly identified on these maps, such as Special Flood Hazard Areas (SFHAs). Development may take place within mapped SFHAs, provided that it complies with local floodplain management regulations, which must meet the minimum federal requirements.

The City is a participating community in the NFIP. Therefore, the City is responsible for adopting a floodplain management ordinance that meets certain minimum requirements intended to reduce future flood losses. The City has adopted Development Regulations for SFHAs in the SDMC Sections 143.0145 and 143.0146. If development is proposed within one of the SFHA Zones, these existing regulations will apply.

4.7.2 State

4.7.2.1 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal CWA. The state of California is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and other surface waters and groundwater basins, and establish water quality objectives for those waters.

4.7.2.2 NPDES Construction General Permit

The NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; SWRCB Order No. 2022-0057-DWQ, NPDES General Permit No. CAS000002) was adopted September 8, 2022 and superseded Order 2009-0009-DWQ as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ.

Construction activities exceeding one acre (or meeting other applicable criteria) are subject to pertinent requirements under the Construction General Permit. Specific conformance requirements include: developing a Stormwater Pollution Prevention Plan (SWPPP) and keeping it up to date; complete and submitting a Notice of Intent to the USEPA via the NPDES eReporting Tool (NeT); implement erosion and sediment controls and pollution prevention practices throughout the entire construction project; conducting required inspections to verify compliance with permit (inspections may only be conducted by a qualified person who has either: (1) completed the USEPA construction inspection course and passed the exam, or (2) holds a current construction inspection certification or license from a program that covers the same core material as EPA's inspection course); conducting routine maintenance and taking corrective action to fix problems with controls or discharges; completing documentation of all site inspections, dewatering inspections, and corrective actions; complying with turbidity monitoring requirements for dewatering discharges to sensitive waters (if applicable); and complying with any state, Tribal, or territory-specific requirements in Part 9 of the permit

Site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil characteristics, and detailed guidance for construction-related BMPs is provided in the permit and in related City standards.

4.7.2.3 NPDES Groundwater Permit

If construction activities entail the discharge of extracted groundwater into receiving waters, the applicant would be required to obtain coverage under the Groundwater Permit (Order No. R9-2008-0002, NPDES No. CAG919002). Conformance with this permit is generally applicable to all temporary and certain permanent groundwater discharges to surface waters, estuaries, and the Pacific Ocean,

with some exceptions as noted in the permit fact sheet. Specific requirements for permit conformance include: (1) submittal of appropriate application materials and fees; (2) implementation of pertinent (depending on site-specific conditions) monitoring/testing, disposal alternative, and treatment programs; (3) provision of applicable notification to the associated local agency prior to discharging to a municipal storm drain system; (4) conformance with appropriate effluent standards (as outlined in the permit); and (5) submittal of applicable documentation (e.g., monitoring reports).

4.7.2.4 NPDES Municipal Permit

The most current MS4 Permit for Region 9, Order No. R9-2013-0001, was adopted on May 8, 2013 by the San Diego RWQCB and became effective on June 27, 2013. This Order was amended by adoption of Order No. R9-2015-0001 on February 11, 2015 and adoption of Order No. R9 2015-0100 on November 18, 2015. This is an update to the 2007 MS4 Permit, Order No. R9-2007-0001. Updated City of San Diego Storm Water Standards (based on the Copermittees' Model BMP Design Manual) were adopted on January 3, 2018.

The MS4 Permit implements a regional strategy for water quality and related concerns and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include: (1) providing a consistent set of requirements for all co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities. MS4 Permit conformance entails considerations such as receiving water limitations, waste load allocations, and numeric water quality based effluent limitations. Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable involve methods such as: (1) using jurisdictional planning efforts (e.g., discretionary general plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate BMPs, including low impact development (LID) measures, to avoid, minimize, and/or mitigate effects such as increased erosion and off-site sediment transport (sedimentation), hydromodification¹ and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The City has implemented a number of regulations to ensure conformance with these requirements, as outlined below under local standards.

4.7.2.5 NPDES Industrial Permit

Industrial facilities are subject to the requirements of SWRCB Water Quality Order No. 20140057-DWQ, NPDES Permit No. CAS000001, "Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities" (General Industrial Permit). This permit was adopted on April 1, 2014 and amended in 2015 and 2018. This permit currently

¹ Hydromodification is generally defined in the Municipal Permit as the change in natural watershed hydrologic processes and runoff characteristics (interception, infiltration, and overland/groundwater flow) caused by urbanization or other land use changes that result in increased stream flows and sediment transport.

applies to operation of existing industrial facilities associated with nine broad categories of industrial activities, and will apply to operation of proposed new industrial facilities within those nine categories. The General Industrial Permit requires the implementation of storm water management measures and development of a SWPPP. The 2018 update included the federal Sufficiently Sensitive Test Method Ruling; TMDL implementation requirements; and statewide compliance options incentivizing on-site or regional stormwater capture and use.

4.7.3 Local

4.7.3.1 Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange Counties. The basin is composed of 11 major hydrologic units, 54 hydrologic areas, and 147 hydrologic subareas, extending from Laguna Beach southerly to the United States/Mexico border. Drainage from higher elevations in the east flow to the west, ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

4.7.3.2 City of San Diego Jurisdictional Runoff Management Plan

The City's Jurisdictional Runoff Management Plan (City 2023) is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the RWQCB permit referenced above. The document describes how the City incorporates storm water BMPs into land use planning, development review and permitting, City CIP project planning and design, and the execution of construction contracts.

4.7.3.3 Water Quality Improvement Plans

The MS4 Permit also requires development of WQIPs that guide the Copermittees' jurisdictional runoff management programs toward achieving improved water quality in MS4 discharges and receiving waters. The San Diego River Watershed Management Area WQIP, originally accepted by the RWQCB in 2016, applies to the AMP area, which drains to the San Diego River. The WQIPs further the CWA's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest-priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions.

The San Diego River Watershed Management Area jurisdictions developed an update of the WQIP in 2021. The focus of the update was the incorporation of Famosa Slough Alternative TMDL. The update was submitted to the San Diego RWQCB with the Water Quality Improvement Plan 2019-2020 Annual Report provided in Appendix 5, Attachment 5B. The RWQCB issued an acceptance letter for the WQIP update on August 9, 2021.

4.7.3.4 Drainage Design Manual

Chapter 14, Article 2, Division 2 of the SDMC outlines Storm Water Runoff and Drainage Regulations, which apply to all development in the City, regardless of whether a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the LDM as Appendix B). The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for developments within the City.

4.7.3.5 Storm Water Standards Manual

The City's current Storm Water Standards Manual, most recently updated in 2021, provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual include:

1. LID Best Management Practices Requirements
2. Source Control BMPs
3. BMPs Applicable to Individual Priority Development Project Categories
4. Treatment Control BMPs

Although the footprint of the LID BMPs can often fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features. The Storm Water Standards Manual also addresses "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations. Future development projects proposed within areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Exemptions from hydromodification management requirements shall adhere to the current City's Storm Water Standards Manual. Projects discharging into underground storm drains discharging directly to bays or the ocean are exempt, subject to conditions listed in the City's Storm Water Standards Manual.

The Storm Water Standards Manual also provides minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and minimum performance standards, including the following: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and natural hydraulic features and riparian buffers preserved where possible. The City's current Storm Water Standards Manual is consistent with the Regional Best Management Practices Design Manual.

4.7.3.6 City of San Diego Grading Ordinance

The City Grading Ordinance (SDMC Section 142.0101 et seq.) incorporates a number of requirements related to hydrology and water quality, including BMPs necessary to control storm water pollution from sources such as erosion/sedimentation and construction materials during project construction and operation. Specifically, these include elements related to slope design, erosion/sediment control, revegetation requirements, and material handling/control.

4.7.3.7 City of San Diego General Plan

The General Plan presents goals and policies for storm water infrastructure in the Public Facilities, Services, and Safety Element, and presents goals and policies for open space (including floodplain management) and urban runoff management in the Conservation Element.

4.8 Land Use

4.8.1 Federal

4.8.1.1 Airport Airway Improvement Act

FAA AIP funding for an airport development project may not be approved unless the Secretary of Transportation receives satisfactory written assurance that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal aircraft operations, including the landing and takeoff of aircraft.

4.8.2 State

4.8.2.1 General Plan Consistency with the Airport Land Use Compatibility Plan

Public Utilities Code Section 21675 requires each ALUC to formulate ALUCPs. California Government Code Section 65302.3 further requires that general plans and any applicable specific plan be consistent with ALUCPs. In addition, general plans and applicable specific plans must be amended to reflect amendments to the ALUCP.

4.8.2.2 Climate Change Scoping Plan

Refer to Section 4.4.2.15 for discussion of CARB's Climate Change Scoping Plan.

4.8.3 Local

The following discussion describes local land use plans, ordinances, and regulations that apply to the proposed project, including the General Plan, the Kearny Mesa Community Plan, relevant SDMC regulations, the City's MSCP SAP, the Montgomery Field ALUCP, and San Diego Forward: The Regional Plan.

4.8.3.1 City of San Diego General Plan

An update of the General Plan was adopted in 2024, building off the City of Villages strategy, which was first adopted as part of the Strategic Framework Element of the General Plan in 2002. The Strategic Framework Element represented the City's new approach for shaping how the City will grow while attempting to preserve the character of its communities and its most treasured natural resources and amenities. It was developed to provide the overall structure to guide the General Plan update and future community plan updates and amendments, as well as the implementation of an action plan.

Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

The General Plan includes 11 elements intended to provide guidance for future development. The elements applicable to the proposed project are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Public Facilities, Services, and Safety Element; (4) Conservation Element; (5) Noise Element; and (6) Historic Preservation Element.

Land Use and Community Planning Element

The Land Use and Community Planning Element provides overarching policies to integrate the City of Villages strategy and guides the provision of public facilities while accommodating planned growth. Policies within this element, in combination with other elements, also ensure consistency with zoning regulations (e.g., SDMC).

The Land Use and Community Planning Element contains two goals related to airport land use compatibility. These goals are to provide:

- Protection of the health, safety, and welfare of persons within an airport influence area by minimizing the public's exposure of high levels of noise and risk of aircraft-related accidents.
- Protection of public use of airports and military air installations from the encroachment of incompatible land uses within an airport influence area that could unduly constrain airport operations.

Airports affect future land uses and, at the same time, land uses can affect airports in that incompatible land uses can restrict airport operations or lead to the closure of an airport. As discussed in further detail in Section 4.8.3.10 the SDCRAA Board, as the ALUC, prepared the ALUCP for MYF. The ALUCP addresses compatibility between airports and surrounding future land uses by analyzing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards. Since the ALUC does not have land use authority, the City implements the ALUCP through land use plans, development regulations, and zoning ordinances. When an ALUCP is amended or updated, the City is required to submit the land use plans (General Plan and community plans) that are within the AIA to the ALUC for consistency

determination. Similarly, when a change to the General Plan is proposed, the City is required to submit the proposed change to the ALUC for consistency determination. In addition, General Plan Policy LU-G.8 requires all AMPs be submitted to the ALUC prior to City Council Adoption.

Mobility Element

The Mobility Element sets forth policies that promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. The Mobility Element contains six goals related to airports. These goals are to provide:

- An air transportation system that fosters economic growth.
- Adequate capacity to serve the forecasted passenger and cargo needs at existing airports.
- An air transportation system that is integrated with a multi-modal surface transportation system that efficiently moves people and goods.
- An international airport to serve the region's long-term air transportation and economic needs.
- General aviation airport operations that support public safety, law enforcement, and aviation training activities and promote adjacent commercial and industrial uses.
- Military aviation installations that support national defense and regional economic needs.

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element is directed at providing adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within this Element also apply to fire-rescue, police, wastewater collection and treatment, storm water infrastructure, water supply and distribution, waste management, libraries, schools, public utilities, and disaster preparedness.

Conservation Element

The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. San Diego's resources include, but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy.

Noise Element

The focus of the Noise Element is to minimize excessive noise effects and improve the quality of life of people working and living in the City. The Noise Element identifies a goal of minimizing excessive aircraft-related noise on residential and other noise-sensitive land uses. While the Noise Element articulates the City's goals, the enforcement mechanism to control noise is the City's Noise Ordinance, which is discussed in Section 4.9.

Historic Preservation Element

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources.

4.8.3.2 Kearny Mesa Community Plan

The Kearny Mesa Community Plan identifies key issues, goals, and implementation actions for the community primarily focused on maintaining the community as a regional employment center. The plan was most recently updated in November 2020. Goals set forth in the adopted Kearny Mesa Community Plan are contained in its individual chapters, which include Vision and Land Use; Regulatory Framework and Policies; Historic Preservation; Mobility; Urban Design; Parks, Recreation, and Open Space; and Public Facilities, Services, and Safety.

Specific policies included in the Kearny Mesa Community Plan that are relevant to the airport include the following:

- Policy 1.26: Ensure that future uses, building intensity, residential density, and heights are compatible with the safety zones, noise contours, and airspace protection surfaces identified in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for Montgomery-Gibbs Executive Airport and MCAS Miramar.
- Policy 1.27: Review development for consistency with adopted airport policies, such as those set forth in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for Montgomery-Gibbs Executive Airport and MCAS Miramar.
- Policy 4.20: Coordinate with the Montgomery-Gibbs Executive Airport and/or other adjacent property owners on the implementation of the urban pathways comprised of a combination of pedestrian ways, bike lanes, multi-use paths, linear parks and/or trails for the Airport Loop, Aero Promenade, Opportunity Trails, and Park Link.

4.8.3.3 Climate Action Plan

Refer to Section 4.4.3.3 for discussion of the City's CAP.

4.8.3.4 San Diego Municipal Code

Airports

Chapter 6 Article 8 Division 1, *Airports*, of the SDMC provides rules and regulations governing the conduct of operations at all City-owned or controlled airports.

4.8.3.5 Land Development Code Regulations

Chapters 11 through 15 of the SDMC are referred to as the LDC, as they contain the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed and used within the City. The LDC contains Citywide base zones that specify permitted land uses, residential density, floor area ratio (FAR), and other development requirements for given zoning classifications;

as well as overlay zones and supplemental regulations that provide additional development requirements. Development under the proposed AMP area is subject to the development regulations of the LDC.

Airport Land Use Compatibility Overlay Zone

The purpose of the Airport Land Use Compatibility Overlay Zone (SDMC Sections 132.1501 through 132.1555) is to implement the adopted ALUCPs, in accordance with state law, as applicable within City property. The intent of these supplemental regulations is to ensure that new development located within an AIA is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas.

General Development Regulations

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within Chapter 14, General Regulations. Also included within the general regulations of Chapter 14 are the ESL Regulations, discussed below.

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (SDMC Sections 143.0101 through 143.0160) is to protect, preserve and, where damaged restore, the ESLs of the City and the viability of the species supported by those lands. These regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners.

ESLs include sensitive biological resources (including wetlands), steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas. Development on a site containing ESL requires a Site Development Permit in accordance with Section 126.0502 of the SDMC.

Historical Resources Regulations

The purpose of the City's Historical Resources Regulations (contained in Chapter 14, Article 3, Division 2 of the LDC) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties/tribal cultural resources. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners. The Historical Resources Regulations require that development

affecting historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the LDM, as a condition of approval. If development cannot, to the maximum extent feasible, comply with the development regulations for historical resources, then a project would require a Site Development Permit in accordance with Section 126.0502 of the SDMC.

4.8.3.6 Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through SAPs, which describe specific implementing mechanisms.

The City of San Diego's MSCP SAP was approved in March 1997. The MSCP SAP is a plan and process for the issuance of permits under the FESA and CESA and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP SAP is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement (IA) with USFWS and CDFW. The IA serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and SAP. The IA became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

4.8.3.7 Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone].

Boundary line adjustments to the MHPA within the VPHCP Plan Area are described in Section 8.4.2 of the MSCP Plan. A proposed boundary line adjustment is required to evaluate conservation and impacts to vernal pools and covered species that would occur because of the adjustment. This evaluation would be provided in a biological technical report and an environmental document. The determination of the biological value of a proposed boundary line adjustment would be made by the City according to the MSCP Plan (Section 5.4.2) and the VPHCP. The change must also receive written concurrence from the Wildlife Agencies, before the release of the environmental document for public review. An adjustment that either Wildlife Agency determines does not meet the equivalency test would require a major amendment to the VPHCP.

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to

sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance” with the City’s Biological Guidelines.

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.

4.8.3.8 MHPA Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The MHPA LUAGs are intended to be incorporated into the MMRP and/or applicable permits during the development review phase of a project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/land development.

Drainage

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

Toxics

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, or that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.

Lighting

Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Noise

Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

Barriers

New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

Invasive Species

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

Brush Management

New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than what is currently required by the City's SDMC.

The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards (i.e., to avoid the nesting season and preferentially remove non-natives over natives) and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners' association or other private party.

Grading/Land Development

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

4.8.3.9 Framework Management Plan

The MSCP SAP Framework Management Plan, included in Section 1.5.1 of the City's MSCP SAP, sets management goals and objectives to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction, and minimizing the need for future listings, while enabling economic growth in the region. Section 1.5.2 of the SAP lists general management directives that apply throughout the SAP area related to mitigation; restoration; public

access, trails, and recreation; litter/trash and materials storage; adjacency management issues; invasive exotics control and removal; and flood control.

The AMP area is identified within Section 1.2.3 of the SAP as being in an “Urban Area” and as containing “Urban Habitat Lands”. The urban habitat areas within the City’s MHPA are primarily concentrated in existing urbanized locations and consist mainly of vernal pool areas, urbanized canyons and stream areas, and associated hillsides which support native habitats and species and promote wildlife movement. Specific and overall management policies and directives for Urban Habitat Lands are listed in SAP Section 1.5.7. Future development within areas identified as Urban Habitats is required to support the overall goals and objectives for urban habitat lands as follows:

The optimum future condition for the urban habitat lands scattered throughout the City of San Diego is as a system of canyons that provide habitat for native species remaining in urban areas; i.e., as “stepping stones” for migrating birds and those establishing new territories and providing environmental educational opportunities for urban dwellers of all ages. The system of urban habitat canyons and natural open space throughout the City provides important areas for people to enjoy and learn about the natural world and local environment. These areas also afford visual beauty and psychological relief from urbanization, while supporting habitat for the maintenance of both common and rare species. These habitats, surrounded by development and modified by urban edge effects; also present unique opportunities for research into habitat fragmentation, viability, and urban wildlife ecology.

4.8.3.10 Airport Land Use Compatibility Plans

The SDCRAA serves as the ALUC for San Diego County. The ALUC is responsible for adopting ALUCPs for 16 public-use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public’s exposure to excessive noise and safety hazards within the AIA for each airport over a 20-year horizon. The City implements the adopted ALUCPs with the Airport Land Use Compatibility Overlay Zone.

The Montgomery Field ALUCP was adopted January 25, 2010 and amended December 20, 2010. It establishes the AIA for the airport, which serves as the boundary for the ALUCP and is divided into two review areas. Review Area 1 encompasses locations exposed to aircraft noise levels of 60 dB CNEL or greater together with the outer boundary of all safety zones. All policies and standards in the ALUCP apply within Review Area 1. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

The ALUCPs contain policies and criteria that address land use compatibilities concerning noise and safety aspects of airport operations and land uses, heights of buildings, residential densities and intensities, and the disclosure of aircraft overflight. The adopted ALUCPs contain policies that limit residential uses in areas experiencing noise above 60 CNEL by placing conditions on residential uses within the 60 CNEL contour. Residential uses in such areas may require sound attenuation to reduce

interior noise levels to 45 dBA. Since the ALUC does not have land use authority, the City implements the ALUCPs through land use plans, development regulations, and zoning regulations. The City is required to submit discretionary and ministerial development applications within an AIA to the ALUC until the City adopts regulations implementing the ALUCP and the ALUC determines the City's zoning, development regulations, and land use plans consistent with the ALUCP, or the City Council takes action to overrule the ALUC with a two-thirds vote.

4.8.3.11 San Diego Forward: The Regional Plan

As discussed in Section 4.4.3.1, the Regional Plan, prepared and adopted by SANDAG in 2021, is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The Regional Plan supports healthy communities, a protected environment, a vibrant economy, and mobility choices for the region's residents over the next 35 years. It is a comprehensive roadmap that integrates the RTP, the SCS, and the Regional Comprehensive Plan into one document to chart the region's future growth and transportation investments.

4.8.3.12 Build Better SD

Build Better SD is a citywide initiative to support the City's equity, access, conservation and sustainability goals. This initiative sets clear policies intended to create more opportunities for innovative, culturally relevant and interactive public spaces by prioritizing investments in areas where the needs are greatest – streamlining the delivery of more infrastructure, to more people, more quickly. City Council adopted the initiative on Aug. 1, 2022.

4.9 Noise

4.9.1 Federal

4.9.1.1 The Control and Abatement of Aircraft Noise and Sonic Boom Act of 1968 and the Noise Control Act of 1972

The Control and Abatement of Aircraft Noise and Sonic Boom Act of 1968 established regulations to abate noise and authorized the FAA to prescribe standards for the measurement of aircraft noise. The Noise Control Act of 1972 amended the Control and Abatement of Aircraft Noise and Sonic Boom Act of 1968 to add consideration of the protection of public health and welfare and to add the USEPA to the rulemaking process for aircraft noise and sonic boom standards.

4.9.1.2 Aviation Safety and Noise Abatement Act of 1979

This act (as amended) aids airport operators in the preparation and undertaking of noise compatibility programs, helps to provide assistance to assure continued safety in aviation, and provides assistance to aircraft operators to aid in complying with noise standards. Compatible land use essentially means the use of the land is normally compatible with the outdoor noise environment at the location (14 CFR Section 150.7).

4.9.1.3 Airport and Airway Improvement Act of 1982

This act authorizes funding for noise mitigation and noise compatibility planning and projects, and establishes certain requirements related to noise-compatible land use for federally funded airport development projects.

4.9.1.4 Airport Noise and Capacity Act of 1990

The Airport Noise and Capacity Act of 1990 mandated the phaseout of Stage 2 jet aircraft over 75,000 pounds and establishes requirements regarding airport noise and access restrictions for Stage 2 and 3 aircraft.

4.9.1.5 Section 506 of the FAA Reauthorization Act of 2019

The FAA Reauthorization Act of 2018 was signed into law on October 5, 2018. It extended FAA's funding and authorities through Fiscal Year 2023. The bill includes important legislative changes related to increasing the safety and pace of unmanned aircraft system integration, expediting the financing and development of airport capital projects, directing the FAA to advance leadership in the field of international supersonic aircraft policies, addressing aircraft noise, and ensuring safe lithium battery transport. The FAA Reauthorization Act of 2023 is currently being developed.

4.9.2 State

4.9.2.1 California Noise Control Act of 1973

Sections 46000 through 46080 of the California H&SC, known as the California Noise Control Act of 1973, find that excessive noise is a serious hazard to the public health and welfare, and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The Act also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The Act declares that the state of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

4.9.2.2 California Noise Insulation Standards (California Residential Code Title 24, Part 2.5, Appendix K – Sound Transmission)

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for hotels, motels, dormitories, and multi-family residential buildings. Title 24 requires that residential structures be designed to prevent the intrusion of exterior noise so that the interior noise, with windows closed, attributable to exterior sources shall not exceed 45 CNEL in any habitable room. The regulations also specify that acoustical studies must be prepared whenever a multi-family residential building or structure may be exposed to exterior noise levels of 60 CNEL or greater. Such acoustical analysis must demonstrate that the residences have been designed to limit intruding noise to a maximum interior noise level of 45 dBA CNEL.

4.9.2.3 California Green Building Standards Code (CALGreen)

Section 5.507.4 of the 2022 CALGreen (CBSC 2022) establishes requirements for acoustical control in non-residential buildings. The standards require that wall and roof-ceiling assemblies making up the building envelope shall have a Sound Transmission Class (STC) value of at least 50 or a composite Outdoor-Indoor STC (OITC) rating of no less than 40, and exterior windows shall have a minimum STC of 40 or OITC of 30 for buildings within: (1) the 65 CNEL noise contour of an airport; or (2) the 65 CNEL or L_{DN} noise contour of a freeway or expressway, railroad, industrial source, or fixed-guideway source. Wall and floor-ceiling assemblies separating tenant spaces and public places shall have an STC of at least 40. Additionally, Section A5.507.5 requires that classrooms have a maximum interior background noise level of no more than 45 dBA L_{EQ} .

4.9.3 Local

4.9.3.1 City of San Diego General Plan

The Noise Element of the City's General Plan (City 2024a) includes the following policies intended to minimize noise through standards, site planning, and noise mitigation.

1. Policy NE-A.1: Separate excessive noise-generating uses from residential and other noise sensitive land uses with a sufficient spatial buffer of less sensitive uses.
2. Policy NE-A.2: Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
3. Policy NE-A.3: Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.
4. Policy NE-A.4: Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the proposed project design to meet the noise guidelines.
5. Policy NE-A.5: Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.

In addition, the Noise Element includes Land Use - Noise Compatibility Guidelines which identify the limits for acceptable noise levels for different land use categories, as illustrated in Table 4-2, *City of San Diego Land Use Noise Compatibility Guidelines*.

Table 4-2
CITY OF SAN DIEGO LAND USE NOISE COMPATIBILITY GUIDELINES

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	<60	60-65	65-70	70-75	75+
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units		45	45		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; K-12 Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities including Vocational/Trade Schools and Colleges, and Universities)		45	45		
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Apparel & Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Vehicle Repair & Maintenance; Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					50
Wholesale, Distribution, Storage Use Category					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					50
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					50
Research & Development				50	50

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Source: City 2024a

dbA = A-weighted decibel; CNEL = Community Noise Equivalent Level

As shown, the “compatible” noise level for noise-sensitive receptors, including single- and multi-family residential, is 60 dBA CNEL. Compatibility indicates that standard construction methods will attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.

Exterior noise levels ranging between 60 and 65 dBA CNEL are considered “conditionally compatible” for single-family units, and between 65 and 70 dBA CNEL for multiple units. The Noise Element also states (Section B, Motor Vehicle Traffic Noise) that although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dBA CNEL with a requirement to include attenuation measures to ensure an interior noise level of 45 dBA CNEL where a Community Plan allows multi-family and mixed-use.

Park uses are considered compatible in areas up to 70 dBA CNEL and conditionally compatible in areas between 70 and 75 dBA CNEL.

The Noise Element also addresses aircraft noise. Policy NE-D.4 discourages outdoor uses in areas where people could be exposed to prolonged periods of high aircraft noise levels greater than the 65 dBA CNEL airport noise contour. Policy NE-D.5 is to minimize excessive aircraft noise from aircraft operating at Montgomery-Gibbs Executive Airport to surrounding residential areas. Lastly, Policy NE-D.7 limits future uses within AIAs when the noise policies in the compatibility plans are more restrictive for uses affected by aircraft noise than shown in Table 4-2.

4.9.3.2 City of San Diego Municipal Code Noise Abatement and Control Ordinance

SDMC Chapter 5 Article 9.5, Noise Abatement and Control, declares that the making, creation, or continuance of excessive noises are detrimental to the public health, comfort, convenience, safety, welfare, and prosperity of the residents of the City. Section 59.5.0401 establishes sound level limits. The exterior noise limits for each land use classification are summarized in Table 4-3, *City of San Diego Table of Applicable Noise Limits*. One-hour average sound levels are not to exceed the applicable limit. The noise subject to these limits is defined as that part of the total noise at the specified location that is due solely to the action of said person.

Per the SDMC Section 59.5.0404, construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dBA

during the 12-hour period from 7:00 a.m. to 7:00 p.m. Further, construction activity is prohibited between the hours of 7:00 p.m. of any day to 7:00 a.m. of the following day, or on legal holidays as specified in SDMC Section 21.04. Exceptions are allowed and subject to a permit granted by the Noise Abatement and Control Administrator.

Table 4-3
CITY OF SAN DIEGO TABLE OF APPLICABLE NOISE LIMITS

Land Use Zone	Time of Day	One-Hour Average Sound Level (dBA)
Single Family Residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
Multi-Family Residential (up to a maximum density of 1/2000)	7:00 a.m. to 7:00 p.m.	55
	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All other Residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or Agricultural	Anytime	75

Source: City of San Diego Municipal Code, Chapter 5, Article 9.5, Division 4, §59.5.0401, Sound Level Limits
dBA = A-weighted decibel

4.9.3.3 Montgomery Field Airport Land Use Compatibility Plan

Properties within and surrounding the AMP area are located within the AIA for MYF and are exposed to noise from aircraft operations at MYF. In addition to the policies and criteria addressing land use compatibilities, including building heights and densities, the ALUCP contains policies and criteria concerning noise. The adopted ALUCP contains policies that place conditions on residential uses at and above the 60 CNEL contour. The ALCUP also contains operational restrictions/noise abatement procedures that include limiting noise levels over residential areas west and south of MYF to 88 dBA during daytime hours (6:30 a.m. to 11:30 p.m.) and 70 dB during nighttime hours (11:30 p.m. to 6:30 a.m.). Figures 4-1a and 4-1b, *MYF ALUCP Airport Noise Compatibility Criteria*, provides the allowable noise levels by land use for MYF.

4.10 Public Services and Facilities

4.10.1 Local

4.10.1.1 City of San Diego Municipal Code

The City requires payment of Development Impact Fees (DIFs) to collect a proportional fair share cost of capital improvements needed to offset the impact of the development (SDMC Section 142.0640). DIFs are based on community-specific financing plans completed when Community Plans

Table III-1

Noise Compatibility Criteria

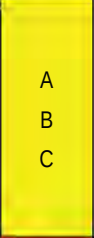
Land Use Category ¹	Exterior Noise Exposure (dB <i>CNEL</i>)			
	60–65	65–70	70–75	75–80
<i>Agricultural and Animal-Related</i>				
horse stables; livestock breeding or farming	A	A	A	
nature preserves; wildlife preserves				
interactive nature exhibits	A			
zoos	A	A		
agriculture (except residences and livestock); greenhouses; fishing				A
<i>Recreational</i>				
children-oriented neighborhood parks; playgrounds	A			
campgrounds; recreational vehicle/motor home parks				
community parks; regional parks; golf courses; tennis courts; athletic fields; outdoor spectator sports; fairgrounds; water recreation facilities		A		
recreation buildings; gymnasiums; club houses; athletic clubs; dance studios		50	50	
<i>Public</i>				
outdoor amphitheaters	A			
children's schools (K-12); day care centers (>14 children)	45			
libraries	45			
auditoriums; concert halls; indoor arenas; places of worship	45	45		
adult schools; colleges; universities ²	45	45		
prisons; reformatories		50		
public safety facilities (e.g., police, fire stations)		50	50	
cemeteries; cemetery chapels; mortuaries		45 A	45 A	
<i>Residential, Lodging, and Care</i>				
residential (including single-family, multi-family, and mobile homes); family day care homes (≤ 14 children)	45			
extended-stay hotels; retirement homes; assisted living; hospitals; nursing homes; intermediate care facilities	45			
hotels; motels; other transient lodging ³	45	45	45	
<i>Commercial and Industrial</i>				
office buildings; office areas of industrial facilities; medical clinics; clinical laboratories; radio, television, recording studios		50	50	
retail sales; eating/drinking establishments; movie theaters; personal services		50	50 B	
wholesale sales; warehouses; mini/other indoor storage			50 C	

Source: Montgomery Field Airport Land Use Compatibility Plan, 2010

Table III-1 Continued

Noise Compatibility Criteria

Land Use Category ¹	Exterior Noise Exposure (dB <i>CNEL</i>)			
	60–65	65–70	70–75	75–80
industrial; manufacturing; research & development; auto, marine, other sales & repair services; car washes; gas stations; trucking, transportation terminals			50 C	
extractive industry; utilities; road, rail rights-of-way; outdoor storage; public works yards; automobile parking; automobile dismantling; solid waste facilities				50 C
animal shelters/kennels	50	50	50	

Land Use Acceptability	Interpretation/Comments
 Compatible	<i>Indoor Uses:</i> Standard construction methods will sufficiently attenuate exterior noise to an acceptable indoor community noise equivalent level (<i>CNEL</i>) <i>Outdoor Uses:</i> Activities associated with the land use may be carried out with essentially no interference from aircraft noise
 45 50 Conditional ⁴	<i>Indoor Uses:</i> Building structure must be capable of attenuating exterior noise to the indoor <i>CNEL</i> indicated by the number; standard construction methods will normally suffice <i>Outdoor Uses:</i> <i>CNEL</i> is acceptable for outdoor activities, although some noise interference may occur.
 A B C Conditional ⁴	<i>Indoor or Outdoor Uses:</i> A Caution should be exercised with regard to noise-sensitive outdoor uses; these uses are likely to be disrupted by aircraft noise events; acceptability is dependent upon characteristics of the specific use ⁵ B Outdoor dining or gathering places incompatible above 70 dB <i>CNEL</i> C Sound attenuation must be provided for associated office, retail, and other noise-sensitive indoor spaces sufficient to reduce exterior noise to an interior maximum of 50 dB <i>CNEL</i>
 Incompatible	Use is not compatible under any circumstances.

Notes:

- Land uses not specifically listed shall be evaluated, as determined by the *ALUC*, using the criteria for similar uses.
- Applies only to classrooms, offices, and related indoor uses. Laboratory facilities, gymnasiums, outdoor athletic facilities, and other uses to be evaluated as indicated for those land use categories.
- Lodging intended for stays by an individual person of no more than 25 days consecutively and no more than 90 days total per year; facilities for longer stays are in the extended-stay hotel category.
- An *aviation easement* is required for any project situated on a property lying within the projected 65 dB *CNEL* noise contour. See Policy 2.11.5 and Policy 3.3.3(d).
- Noise-sensitive land uses are ones for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common types of noise-sensitive land uses include, but are not limited to, the following: residential, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child-care facilities, and certain types of passive recreational parks and open space.

Source: San Diego County Regional Airport Authority, October 2009.

Prepared by: Ricondo & Associates, Inc., January 2010.

Source: Montgomery Field Airport Land Use Compatibility Plan, 2010

are updated. Financing plans were formerly known as Public Facilities Financing Plans and are now referred to as Impact Fee Studies (IFS). The IFS sets community-level priorities for facility financing and ensure that new development pays it proportionate fair share of public facilities costs through the payment of DIFs.

4.10.1.2 City of San Diego General Plan

Public Facilities, Services, and Safety Element

The General Plan Public Facilities, Services, and Safety Element (City 2024a) includes a number of policies that address the financing, development, and management of public facilities and infrastructure, including transportation, storm drains, parks and recreation, fire-rescue, police, and libraries.

Police Protection

As specified in the General Plan, Public Facilities, Services, and Safety Element, Policy PF-E.2, the City goal is to maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within 7 minutes
- Priority 1 Calls (serious crimes in progress) within 12 minutes
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes
- Priority 4 Calls (minor requests for police service) within 90 minutes

Fire Protection

The SDFD has an active program that promotes the clearing of canyon vegetation away from structures in accordance with SDMC Section 142.0412 and the SDFD's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on City property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the SDFD (per SDMC Section 142.0412[i] or a previously recorded entitlement requires a width more or less than the standard 100 feet). Other fire prevention measures include adopting safety codes and an aggressive brush management program. Citywide fire service goals, policies, and standards are located in the Public Facilities, Services, and Safety Element of the General Plan and the SDFD's Fire Service Standards of Response Coverage Deployment Study.

Response time standards are provided in the General Plan Public Facilities, Services, and Safety Element and summarized below (per Policy PF-D.1):

- To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This

equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas.

- To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
 - o This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to five medical patients at once.
 - o This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8 minute drive time spacing for multiple units in the most populated areas.

To direct fire station location timing and crew size planning as the community grows (per Policy PF-D.2), fire unit deployment performance measures are established based on population density zones and are provided in Table 4-4, *Deployment Measures for San Diego City Growth by Population Density per Square Mile*.

Table 4-4
DEPLOYMENT MEASURES FOR SAN DIEGO CITY GROWTH
BY POPULATION DENSITY PER SQUARE MILE

	>1,000 people/ sq. mi.	1,000 to 500 people/sq. mi.	500 to 50 people/sq. mi.	Permanent Open Space Areas
1 st Due Travel Time	5	12	20	10
Total Reflex Time	7.5	14.5	22.5	12.5
1 st Alarm Travel Time	8	16	24	15
1 st Alarm Total Reflex	10.5	18.5	26.5	17.5

Source: City 2024a

The following population-based performance measures are used to plan for needed facilities (per Policy PF-D.2). Where more than one square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregates into a population “cluster,” these measures guide the determination of response time measures (Table 4-5, *Deployment Measures to Address Future Growth by Population Clusters*) and the need for fire stations.

Table 4-5
DEPLOYMENT MEASURES TO ADDRESS FUTURE GROWTH BY POPULATION CLUSTERS

Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	>200,000 people	4 minutes
Urban-Suburban	<200,000 people	5 minutes
Rural	500-1,000 people	12 minutes
Remote	< 500 people	>15 minutes

Source: City 2024a

4.11 Public Utilities

4.11.1 Federal

4.11.1.1 Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), passed by Congress in 1974, authorizes the federal government to set national standards for drinking water. These National Primary Drinking Water Regulations protect against both naturally occurring and man-made contaminants. Enforceable maximum contaminant levels for drinking water also resulted from the SDWA. All water providers in the United States, excluding private wells serving fewer than 25 people, must treat water to remove contaminants.

The 1986 amendments to the SDWA and the 1987 amendments to the CWA established the USEPA as the primary authority for water programs throughout the country. The USEPA is the federal agency responsible for providing clean and safe surface water, groundwater, and drinking water, and protecting and restoring aquatic ecosystems.

4.11.2 State

4.11.2.1 Senate Bills 221 and 610

SB 221 and SB 610 went into effect in January 2002 with the intention of linking water supply availability to land use planning by cities and counties. SB 610 requires water suppliers to prepare a Water Supply Assessment report for inclusion by land use agencies during the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of a large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential developments of more than 500 units; shopping centers or businesses employing more than 1,000 people; shopping centers or businesses having more than 500,000 SF of floor space; commercial office buildings employing more than 1,000 people; and/or commercial buildings having more than 250,000 SF of floor space or occupying more than 40 acres of land.

4.11.2.2 California Water Plan

The California Water Plan, updated every five years, is the State's strategic plan for sustainably and equitably managing and developing water resources for current and future generations. The California Water Plan was updated in 2023 to promote climate resilience across regions and water sectors with a statewide vision, clear goals, watershed planning framework and toolkit, and progress-tracking dashboard of indicators. It also includes updated resource management strategies, regional planning and performance tracking tools, water balances, future scenarios, and other technical and policy-related activities related to water resilience and sustainability.

SB 659, or the California Water Supply Solutions Act of 2023, was signed into law on October 8, 2023. It requires the California Department of Water Resources, as part of the 2028 update to the California Water Plan, and each subsequent update thereafter, to provide actionable

recommendations to develop additional groundwater recharge opportunities that increase the recharge of the state's groundwater basins.

4.11.2.3 Senate Bill 606

SB 606 requires urban retail water suppliers to calculate an urban water use objective. The urban water use objective is an estimate of aggregate efficient water use from the previous year based on adopted water use efficiency service area characteristics for that year. New requirements for the urban water use objectives became effective after June 2022 when SWRCB adopted urban water use efficiency standards, performance measures, and variances. Urban water suppliers shall achieve the urban water use objective by Jan 1, 2027. An urban supplier that does not meet its objective may be required by the SWRCB to enact policies and projects that result in additional water savings.

4.11.2.4 Assembly Bill 341

In 2011, the state enacted AB 341, which established a policy goal for California of 75 percent recycling, composting, or source reduction of solid waste by 2020. AB 341 requires that commercial enterprises that generate four cubic yards or more of solid waste weekly and multi-family complexes comprised of five units or more arrange for recycling services. Businesses must provide organics and recycling containers at front-of-house to collect waste generated from products purchased and consumed on the premises.

4.11.3 Local

4.11.3.1 Metropolitan Water District 2015 Regional Urban Water Management Plan

The MWD's Regional UWMP describes and evaluates sources of water supply, efficient uses of water, demand management measures, implementation strategies and schedules, and other relevant information and programs. The plan is updated every five years. Information from MWD's UWMP is used by local water suppliers in the preparation of their own plans. The information included in MWD's UWMP represents the district's most current planning projections of demand and supply capability developed through a collaborative process with the member agencies.

4.11.3.2 Metropolitan Water District 2015 Integrated Water Resources Plan

MWD's Integrated Water Resources Plan is a blueprint for long-term water supply reliability in Southern California. The fundamental goal of the plan is for Southern California to continue to have a reliable water system, considering future challenges related to prolonged droughts and changing climate.

4.11.3.3 San Diego County Water Authority 2020 Urban Water Management Plan

The SDCWA's 2020 UWMP was adopted by the SDCWA Board in May 2021 in accordance with state law and the RUWMP. The 2020 Plan contains a water supply reliability assessment that identifies a

diverse mix of imported and local supplies necessary to meet demands over the next 25 years in average, single-dry year, and multiple-dry year periods.

4.11.3.4 City Council Policies

Council Policy 400-04 outlines the City's Emergency Water Storage Program. The policy mandates that the City's PUD store sufficient water in active, available storage to meet 7.2 months (three-fifths of the annual) of normal City water demand requirements, excluding conservation. Active, available storage is defined as the portion of water that is above the lowest usable outlet of each reservoir.

Council Policy 400-13 identifies the need to provide maintenance access to all sewers to reduce the potential for spills. The policy requires that environmental impacts from access paths in environmentally sensitive areas should be minimized to the maximum extent possible using sensitive access path design, canyon-proficient maintenance vehicles, and preparation of plans that dictate routine maintenance and emergency access procedures.

Council Policy 400-14 outlines a program to evaluate the potential to redirect sewage flow out of canyons and environmentally sensitive areas to an existing or proposed sewer facility located in City streets or other accessible locations. The policy includes an evaluation procedure that requires both a physical evaluation and a cost-benefit analysis. Based on the analysis, if redirection of flow outside the canyon is found infeasible, a Long-Term Maintenance and Emergency Access Plan is required. The plan would be specific to the canyon evaluated and would prescribe long-term access locations for routine maintenance and emergency repairs along with standard operating procedures identifying cleaning methods and inspection frequency.

City Council Policy 600-43 established a set of comprehensive guidelines for the review and processing of applications for the placement and design of Wireless Communication Facilities in accordance with the City of San Diego land use regulations. These guidelines are intended to prescribe clear, reasonable, and predictable criteria to assess and process applications in a consistent and expeditious manner, while reducing visual and land use impacts associated with Wireless Communication Facilities. For applicants seeking placement of a Wireless Communication Facility on City-owned land, this policy should be used in conjunction with applicable Council policies and LDC Section 141.0420.

City Council Policy 700-44 established a policy regarding flood control measures and responsibility of these protection measures as they related to private and public property. Individual property owners are primarily responsible for the prevention of flood damage to private property. The policy further states that City's Office of Emergency Management shall offer a continuing program of educating the public on the techniques of flood damage prevention and will endeavor to maintain an up-to-date listing of commercial sources for sand, sandbags, pumps, and electrical generators and will make the listing available to the public upon request.

Per City Council Policy 800-04, private landowners/developers are responsible for providing adequate storm water drainage facilities, which are subject to review and approval by the City. Council Policy 800-04 states it is the basic responsibility of any owner or holder of land to accept and provide a suitable conveyance of storm water runoff, and that the cost of construction will be borne by the property owner or permittee. All continuing maintenance of such facilities becomes the responsibility of the property owner on whose land the facilities are located. The City's

Transportation and Storm Water Department is only responsible for maintaining and upgrading public storm water drainage facilities that occur on City-owned land, and areas where easements have been granted to and accepted by the City.

4.11.3.5 City of San Diego Sewer Design Guidelines

The City's Sewer Design Guidelines set forth criteria to be used for the design of sewer systems, which may consist of pump stations, gravity sewers, force mains, and related appurtenances. It includes criteria for determining capacity and sizing of pump stations, gravity sewers and force mains, alignment of gravity sewers and force mains, estimating wastewater flow rates, design of bridge crossings, and corrosion control requirements.

4.11.3.6 City of San Diego Water Facility Design Guidelines

The City's Water Facility Design Guidelines identify general planning, predesign, and design details and approaches to be used for water infrastructure. The guidelines provide uniformity in key concepts, equipment types, and construction materials on facilities built under the Water CIP. These design guidelines assist in providing professionally sound, efficient, uniform, and workable facilities, whether pipelines, pressure control facilities, pumping stations, or storage facilities.

4.11.3.7 City of San Diego Urban Water Management Plan

The City's UWMP serves as an overarching integrated water resources planning document for residents, businesses, interest groups and public officials. This plan provides information on current and future water demands and supplies, discusses water resources challenges, and summarizes major initiatives that the City has proactively taken to ensure a safe, reliable water supply for its water customers. The 2020 UWMP is an update to the 2015 UWMP and was prepared in response to California Water Code Sections 10610 through 10656 of the Urban Water Management Planning Act. Included in the 2020 plan is detailed information about the City's water demand, supply and reliability projections for the next 20 years.

4.11.3.8 Climate Action Plan

The City's 2022 CAP aims to reduce landfill waste by promoting a Zero Waste by 2040 goal. The City implements the City Recycling Ordinance and Construction and Demolition Debris Deposit Ordinance and a variety of other waste diversion programs to position the City to achieve zero waste. In addition, the City has expanded its efforts to increase composting and prevent food waste in response to California State SB 1383, which requires the reduction of organic waste disposed of in landfills.

4.11.3.9 Waste Management Plans

Pursuant to the City's CEQA Significance Determination Thresholds, land development projects more than 40,000 SF that may generate approximately 60 tons of waste or more during construction and/or operation are required to prepare a project-specific Waste Management Plan (WMP) to address disposal of waste generated during short-term project construction and long-term post-

construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals.

4.12 Transportation and Circulation

4.12.1 State

4.12.1.1 California Department of Transportation

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects. In addition, Caltrans must review proposals to signalize any freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

4.12.1.2 Senate Bill 743

SB 743, which was codified in PRC Section 21099 on September 27, 2013, required changes to the guidelines implementing CEQA regarding the analysis of transportation impacts. Specifically, SB 743 required the California Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must promote the reduction of GHG emissions, the development of multi-modal transportation networks, and a diversity of land uses. To that end, OPR proposed, and the California Natural Resources Agency has certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. With the California Natural Resources Agency's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally are no longer the basis for determining a significant environmental effect under CEQA. While the updated CEQA Guidelines went into effect on January 3, 2019, cities and other agencies have an opt-in period until July 1, 2020 before SB 743 compliant CEQA analysis becomes mandatory statewide.

4.12.2 Local

4.12.2.1 San Diego Forward: The Regional Plan

See Section 4.4.3.1 for discussion of the Regional Plan.

4.12.2.2 City of San Diego General Plan

The Mobility Element of the General Plan (City 2024a) defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through

the development and operation of a balanced, well-connected, safe, sustainable, and equitable multimodal transportation system for people to safely, conveniently, and enjoyably move around.” The main goals of the Mobility Element pertain to walkable communities, transit first, the street and freeway system, intelligent transportation systems, transportation demand management, bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

4.13 Visual Effects and Neighborhood Character

4.13.1 State

4.13.1.1 California Scenic Highways Program

Recognizing the value of scenic areas and the value of views from roads in such areas, the California State Legislature established the California Scenic Highway Program in 1963. This legislation sees scenic highways as “a vital part of the all-encompassing effort to protect and enhance California’s beauty, amenity and quality of life.” Under this program, a number of state highways have been designated as eligible for inclusion as scenic routes. The one-mile portion of SR 163, known as the Cabrillo Freeway, between the north and south boundaries of Balboa Park, is an Officially Designated State Scenic Highway. SR 52 to the north of the AMP area is an eligible state scenic highway although not officially designated.

4.13.2 Local

4.13.2.1 City of San Diego General Plan

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

Urban Design Element

The Urban Design Element of the General Plan establishes a set of design principles on which its policies are based and on which future public and private development physical design decisions can be based. Policy categories relevant to the project include natural features (wetland preservation), development adjacent to natural features and park lands, architecture, historic character, and landscape.

Conservation Element

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

and with consideration of habitat and water conservation goals, as well as the retention of significant and mature trees.

4.13.2.2 City of San Diego Land Development Code

The City's LDC contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights; maximum lot coverage; FARs; and front, rear, and side yard setbacks, the LDC provides restrictions on land development and design that affect visual quality.

The LDC also contains development restrictions and guidelines to protect and enhance ESLs. Steep hillsides are defined as those with natural gradients equal to or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet. The AMP area does not contain any steep hillsides meeting these criteria, and these regulations are not further discussed.

The LDC (Section 142.0101 et seq.) contains grading regulations to address (among other things) landform preservation and require that all grading be designed and performed in conformance with applicable City Council policies and the standards established in the LDM.

4.13.2.3 Kearny Mesa Community Plan

The Urban Design chapter of the 2020 Kearny Mesa Community Plan provides a framework for urban design and guidance for infill and placemaking design, including design of rights-of-way, active streetscape and building interface, connectivity through superblocks, and wayfinding. The Goals set forth in Community Plan focus on creating active streets and inviting streetscapes. These goals are generally not applicable to the project.

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5.0 ENVIRONMENTAL ANALYSIS

5.1 Air Quality

This section of the PEIR addresses potential impacts to air quality that could result from the construction and operation of improvements included within the proposed AMP. The analysis of construction, non-flight operations such as vehicular use and building energy use, and aircraft exhaust lead emissions health risks is based on the *Montgomery-Gibbs Executive Airport Master Plan Update Air Quality Technical Report* (HELIX 2025a), which is included as Appendix B of this PEIR. Aircraft-related impacts (except for aircraft exhaust lead emissions health risks) are based on the *Airport Master Plan Study for Montgomery-Gibbs Executive Airport – 2037 Forecast Noise and Air Quality Modeling Assumptions Technical Memorandum* (HMMH 2019), which is included as Appendix C.

5.1.1 Existing Conditions

The existing environmental setting, which includes a detailed discussion and description of existing air quality conditions within the SDAB is contained in Section 2.4.1 of this PEIR. Section 4.1 of this PEIR includes a summary of regulatory framework relative to air quality.

5.1.2 Methodology and Assumptions

5.1.2.3 Air Quality Plans

The SDAPCD and SANDAG are responsible for developing and implementing plans for the attainment and maintenance of the ambient air quality standards in the SDAB. These air quality plans provide an overview of the region's air quality and identify the pollution-control measures needed to attain and maintain air quality standards. The applicable plans for the SDAB, described below, accommodate emissions from all sources, including natural sources, through the implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the regional air quality plans and the State Implementation Plan (SIP).

Attainment Plan

The regional air quality plan addressing the NAAQS for ozone in the SDAB is SDAPCD's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan). The Attainment Plan outlines SDAPCD's strategies and control measures designed to attain the NAAQS for ozone in the SDAB. Approved by the SDAPCD Board on October 14, 2020, and by CARB on November 19, 2020, the attainment plan was submitted to the USEPA on January 8, 2021, for consideration as a revision to the California SIP for attaining the ozone standards (SDAPCD 2020).

Regional Air Quality Strategy

To comply with State law, the SDAPCD must prepare an updated State Ozone Attainment Plan to identify possible new actions to further reduce emissions. Initially adopted in 1992, the RAQS

identifies measures to reduce emissions from sources regulated by the SDAPCD, primarily stationary sources such as industrial operations and manufacturing facilities. The RAQS is periodically updated to reflect updated information on air quality, emission trends, and new feasible control measures, and was last updated in 2023 (SDAPCD 2023).

5.1.2.4 Air Emissions Modeling

Air emissions from area and energy sources were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod is a computer model used to estimate air emissions resulting from land development projects throughout the state of California. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air quality management and air pollution control districts. The calculation methodology, source of emission factors used, and default data are described in the CalEEMod User's Guide, and Appendices C, D, and G (CAPCOA 2022).

In brief, CalEEMod is a computer model that estimates criteria air pollutant and GHG emissions from mobile (i.e., vehicular) sources, area sources (fireplaces, woodstoves, and landscape maintenance equipment), energy use (electricity and natural gas used in space heating, ventilation, and cooling; lighting; and plug-in appliances), water use and wastewater generation, and solid waste disposal. Emissions are estimated based on land use information input to the model by the user.

In the first module, the user defines the specific land uses that will occur at the project site. The user also selects the appropriate land use setting (urban or rural), operational year, location, climate zone, and utility provider. The input land uses, size features, and population are used throughout CalEEMod in determining default variables and calculations in each of the subsequent modules. The input land use information consists of land use subtypes and their unit or square footage quantities.

Subsequent modules include construction (including off-road vehicle emissions), mobile (on-road vehicle emissions), area sources (woodstoves, fireplaces, consumer products [cleansers, aerosols, solvents], landscape maintenance equipment, architectural coatings), water and wastewater, and solid waste. Each module comprises multiple components including an associated mitigation module to account for further reductions in the reported baseline calculations. Other inputs include trip generation rates, trip lengths, vehicle fleet mix (percentage autos, medium truck, etc.), trip distribution (i.e., percent work to home, etc.), duration of construction phases, construction equipment usage, grading areas, season, and ambient temperature, as well as other parameters.

In various places, the user can input additional information and/or override the default assumptions to account for project- or location-specific parameters. For this assessment, the default parameters were not changed unless otherwise noted. The CalEEMod output files for the project are included in Appendix A of the *Air Quality Technical Report* (HELIX 2025a).

Construction Assumptions

Construction Phasing

Airport improvements identified in the AMP are proposed over the 20-year planning period (2017 to 2037) and are broken down into two 5-year periods (Phase I and Phase II) and one 10-year period (Phase III). Table 3-6 in Chapter 3, *Project Description*, lists the improvement tasks and the phasing. All

tasks are assumed to occur sequentially (no overlap). Phase 1 construction is assumed to commence on January 2, 2026, followed by Phase II construction in January 2028 and Phase III in January 2030. Construction is assumed to occur 8 hours per day, 5 days per week. Some construction activities may occur at night. Please see Appendix B for additional details.

Runway Grooving

Runway grooving is a process in which transverse grooves, typically 0.25 inches wide by 0.25 inches deep on 1.5-inch centers, are cut into a runway to reduce aircraft hydroplaning. Grooving is typically done with a specialized machine which uses a wet grinding process. Water for the process is provided by an accompanying tank truck. The resulting concrete or asphalt waste slurry is either vacuumed by the grooving machine and pumped to the tank truck or flushed from the runway with water. It is assumed that a sweeper/scrubber would be used to further clean the runway at the end of each grinding shift. For the project, runway 10L/28R grooving is assumed to require a 400 horsepower (hp) grooving machine, processing approximately 25,000 SF per day.

Pavement Marking

For new or repaired runway or taxiway surfaces, 10 percent of the surface is assumed to require new marking. It is assumed that the area to be marked would be cleaned of rubber and old paint prior to marking using a self-propelled high-pressure blasting truck, followed by a self-propelled automated pavement marking machine with an assumed total of 712 hp (2 engines). Marking work rate is assumed to be 35,000 SF per day.

Pavement Maintenance

AMP tasks identified as runway, taxiway, or ramp improvements are assumed to be pavement maintenance treatments in accordance with the *Pavement Maintenance Management Plan* (C&S Engineers, Inc. 2019). All pavement improvements are assumed to require re-application of runway and taxiway markings following paving activities. Pavement maintenance and improvements are broken into four categories:

- **Preventative Maintenance and Rehabilitation:** Pavement preventative maintenance or rehabilitation would involve a combination of any of the following operations: crack sealing; shallow patching; deep patching; and/or surface treatment. To be conservative, preventative maintenance is assumed to require the same level of treatment as rehabilitation. Three inches of material are assumed to be removed during shallow patching and six inches of material are assumed to be removed during deep patching. Surface treatment is assumed to be a spray application of a bituminous slurry (also known as a seal coat) without added aggregate. It is assumed that the rehabilitated areas would require new pavement marking. The work rehabilitation rate is assumed to be 10,000 SF per day. The percentage of each rehabilitation area impacted by repair operations is assumed to be:
 - o Crack Sealing – 100%
 - o Shallow Patching – 5%
 - o Deep Patching – 2%
 - o Surface Treatment – 20%
 - o Marking – 10%

- **Reconstruction:** Pavement reconstruction is assumed to require removing up to 6 inches of asphalt concrete using a pavement milling machine and exporting the ground asphalt from the project site. A new layer of asphalt concrete would be placed by a paving machine followed by a roller. It assumed that the rehabilitated areas would require new pavement marking. The reconstruction work rate is assumed to be approximately 25,000 SF per day.
- **New Surface:** The construction of new surfaces for runways, taxiways, aprons, and hangar/tiedown areas is assumed to require excavating to a depth of approximately 18 inches using a combination of rubber-tired dozers and graders and rubber-tired loader and exporting the material from the site. New surfaces are assumed to be typically 12 inches of subgrade laid by a paving machine and compacted with a steel drum vibratory roller, followed by 6 inches of asphalt concrete laid by a paving machine and compacted with a steel drum vibratory roller. The new work rate is assumed to be 12,000 SF per day.
- **Pavement Demolition:** Pavement demolition is assumed to require the removal of the asphalt concrete layer (leaving any aggregate subgrade), grinding the removed asphalt, and exporting the material from the site. The pavement demolition work rate is assumed to be approximately 10,000 SF per day.

Hangar Construction Assumptions

Hangars are assumed to be pre-fabricated and pre-painted panels assembled onto a welded frame with a crane and/or a forklift on a concrete slab foundation. For a typical 50-foot by 50-foot hangar, the foundation is assumed to require 5 workdays and assembly of the building to require 5 days. For a series of hangars, the work rate is assumed to be approximately 500 SF per day.

Construction Equipment

The construction equipment to be used for each improvement task in the proposed AMP has not been determined. A conservative (high) estimate from the *Air Quality Technical Report* of the maximum anticipated required equipment is shown in Table 5.1-1, *Construction Equipment Assumptions*.

**Table 5.1-1
CONSTRUCTION EQUIPMENT ASSUMPTIONS**

Activity Type	Equipment	Quantity	Hours per Day
Pavement Maintenance/ Rehabilitation	Crack Sealing Truck	1	5
	Concrete Saw	1	2
	Tractors/Loaders/Backhoes	1	7
	Paving Equipment	1	2
	Roller	1	2
Pavement Reconstruction	Pavement Milling Machine	1	6
	Paving Machine	1	6
	Paving Equipment	1	6
	Roller	1	7

Activity Type	Equipment	Quantity	Hours per Day
Pavement New Surface	Rubber Tired Dozer	1	4
	Rubber Tired Loader	1	4
	Grader	1	4
	Paving Machine	1	5
	Paving Equipment	1	5
	Roller	1	5
Pavement Demolition	Concrete Saw	1	2
	Rubber Tired Dozer	1	7
	Rubber Tired Loader	1	4
	Excavator	1	7
	Grinding/Crushing Machine	1	4
Pavement Marking	Blasting Truck	1	4
	Marking Machine	1	4
Runway Grooving	Grooving Machine	1	7
	Tank Truck	1	7
	Sweeper/Scrubber	1	1
Hangar Construction	Rubber Tired Dozer	1	4
	Tractors/Loaders/Backhoes	1	4
	Crane	1	3
	Forklift	1	3
	Aerial Lift	1	3
	Welder	1	2
	Generator	1	6

Source: HELIX 2025a

Non-Flight Operational Assumptions

For long-term operation, emissions resulting from the 6,400 SF terminal building, and the 92 new hangars were modeled. Operational emissions were modeled for the first full year of operation following the earliest anticipated completion of all proposed improvements – 2032.

Mobile (Transportation) Sources

Operational emissions from mobile source emissions are associated with project-related VMT (calculated in the model from trip generation and trip lengths). Project trip generation was analyzed in the *Montgomery-Gibbs Executive Airport Transportation Impact Analysis and Local Mobility Analysis* (CR Associates 2025). Project trip generation was based on vehicle counts for airport driveways during one week in February 2025, and on airport flight operations during the same week. Trips and employees per flight operation were calculated and used to estimate 151 new daily airport trips in 2037 (CR Associates 2025). The calculated net new project trips were used in the emissions modeling with CalEEMod default distances, purposes, and fleet mix.

Area Sources

Area sources include emissions from landscaping equipment, the use of consumer products, and the reapplication of architectural coatings for maintenance. Emissions associated with area sources were estimated using the CalEEMod default values.

Energy Sources

Development within the project site would use electricity for lighting, heating, cooling, and appliances. Electricity generation typically entails the combustion of fossil fuels, including natural gas and coal, which is then transmitted to end users. A building's electricity use is thus associated with the off-site or indirect emission of GHG at the source of electricity generation (power plant).

The terminal building could use natural gas for heating, hot water, and appliances which would result in emissions from the combustion of natural gas. Energy use for the terminal were modeled using CalEEMod defaults. Hangars were assumed to use only CalEEMod default electricity not subject to Title 24 (e.g., lighting, plug-in appliances, and tools).

Aircraft-Related Operational Assumptions

Sources of aircraft-related operational emissions include aircraft engines and auxiliary power units (APUs).¹ Future aircraft emissions under buildout of the AMP were assessed by HMMH (2019) in accordance with the FAA's *Aviation Emissions and Air Quality Handbook, Version 3, Update 1* (FAA 2015) and were estimated using the Aviation Environmental Design Tool (AEDT). Emissions were estimated for the proposed 2037 forecast conditions at MYF, incorporating aircraft type, aircraft operations, runway utilization, flight geometry and use, meteorological condition, and terrain data. Refer to Appendix C for additional details on the aircraft air pollutant emissions assessment methodology.

5.1.2.5 Sensitive Receptors

Analysis of impacts to sensitive receptors includes an evaluation of CO hot spots and exposure to toxic air emissions.

Localized Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate federal and state CO standards at intersections, even if the broader basin is in attainment for federal and state levels. Although the SDAB is currently a maintenance area for CO, exhaust emissions can potentially cause a direct, localized hot spot impact at or near the proposed development. Because increased CO concentrations are usually associated with roadways that are congested and with heavy traffic volumes, many agencies have established preliminary screening criteria to determine whether project-generated, long-term operational local mobile-source emissions of CO would result in, or substantially contribute to, emissions concentrations that exceed the state's 1-hour ambient air quality standard of 20 ppm or the 8-hour standard of 9.0 ppm.

Toxic Air Contaminants

Some of the proposed improvements in the AMP would result in changes to the aircraft taxi and flight patterns that could result in changes in localized concentration of lead from aircraft exhaust. The improvement most likely to result in a change in flight patterns would be the removal of the

¹ APUs are devices on planes that provide energy for functions other than propulsion, such as electrical systems.

existing Runway 28R displaced threshold. The improvement that would likely result in a taxi pattern change would be the addition of new aircraft hangars and tiedown spaces east and north of the Sheraton Four Points Hotel. To determine the potential health risks due to changes in localized lead concentrations resulting from implementation of the proposed AMP, dispersion modeling of aircraft exhaust containing lead was performed for the No Project Conditions (2037 operations) and Project Conditions (2037 operations). The resulting community health risk were estimated following the OEHHA's *Air Toxics Hot Spots Program – Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2015). Please see Appendix B for additional details.

5.1.2.6 Odors

Two situations increase the potential for odor problems. The first occurs when a new odor source is located near existing receptors. The second occurs when new receptors are developed near existing sources of odor. SDAPCD Rule 51 (Nuisance) prohibits the emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Projects required to obtain permits from the SDAPCD, typically industrial and some commercial projects, are evaluated by SDAPCD staff for potential odor nuisance and conditions, where necessary, to prevent the occurrence of public nuisance.

The occurrence and severity of odor impacts depend on numerous factors including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

5.1.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the CEQA Guidelines Appendix G, the City's CEQA Significance Determination Thresholds (City 2022a), and applicable air district screening-level thresholds described below. Thresholds have been modified from the City's CEQA Significance Determination Thresholds to reflect a programmatic analysis for the proposed project. A significant air quality impact could occur if implementation of the proposed project would:

1. Conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP;
2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation;
3. Expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations; or
4. Create objectionable odors affecting a substantial number of people.

To determine whether the proposed project would: (a) result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation; or (b) result in a cumulatively considerable net increase of PM₁₀, PM_{2.5}, or the ozone precursors NO_x and

VOCs, the City has adopted screening criteria (City 2022a). These screening criteria are based on the SDAPCD trigger levels listed in Rules 20.2 and 20.3 established for the use in the permitting process for stationary sources of pollutants. Since the last revisions to the City's CEQA guidelines, the SDAPCD has added criteria for PM_{2.5}. The screening criteria were developed by SDAPCD for the preparation of Air Quality Impact Assessments (AQIAs; SDAPCD 2019; SDAPCD 2021). The NAAQS and CAAQS identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Therefore, for CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to air quality or have an adverse effect on human health. The City has not adopted thresholds to determine the significance of exposure of sensitive to substantial TAC concentrations. In Rule 1200, the SDAPCD has adopted thresholds for the significance of cancer and non-cancer health effects for new, relocated, or modified stationary sources of TACs from a facility subject to permitting by the SDAPCD (SDAPCD 2025). The health risk thresholds can be used as screening criteria to determine the significance of a project's emissions of TACs.

The screening thresholds are shown in Table 5.1-2, *Screening-Level Thresholds for Air Quality Impact Analysis*.

**Table 5.1-2
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS**

Pollutant	Total Emissions		
Construction Emissions (Pounds/Day)			
Respirable Particulate Matter (PM ₁₀)	100		
Fine Particulate Matter (PM _{2.5})	67		
Oxides of Nitrogen (NO _x)	250		
Oxides of Sulfur (SO _x)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	137		
Operational Emissions			
	Pounds per Hour	Pounds per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	---	67	10
Oxides of Nitrogen (NO _x)	25	250	40
Oxides of Sulfur (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	137	15
Toxic Air Contaminant Emissions			
Excess Cancer Risk	1 in 1 million 10 in 1 million with T-BACT		
Non-Cancer Hazard	1.0		

Source: City 2022a; SDAPCD 2025; SDAPCD 2021; SDAPCD 2019

T-BACT = Toxics-Best Available Control Technology

Health impacts associated with cancer effects from exposure to TACs are evaluated using the increased risk of developing cancer for an exposed individual receptor expressed as chances per million. SDAPCD Rule 1200 establishes that the incremental increase in cancer risk resulting from

exposure to a project's TAC emissions would be significant if it would exceed 1 in 1 million or 10 in 1 million with implementation of Toxics Best Available Control Technology (T-BACT).²

Health risks associated with non-cancer chronic health effects and acute health effects from TAC exposure are quantified using the maximum hazard index (HI). HI is the potential exposure to a substance divided by the Reference Exposure Limits (REL; the level at which no adverse effects are expected). An HI of less than one indicates no adverse health effects are expected from the potential exposure to the substance.

For aircraft-related emissions, project impacts are compared against the future buildout of the Airport (2037) to determine the change due to the project compared to changes in future aircraft operations that would occur without the project.

SDAPCD Rule 51 (Nuisance) prohibits emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. It is generally accepted that the considerable number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days. Odor complaints from a "considerable" number of persons or businesses in the area would be considered to be a significant, adverse odor impact.

5.1.4 Impact Analysis

5.1.4.1 Issue 1: Conflict with Air Quality Plan

Would the proposed project conflict with or obstruct implementation of the San Diego RAQS or applicable portions of the SIP?

As discussed in Section 5.1.3, the thresholds of significance for the project's criteria pollutant and precursor emissions are based on the SDAPCD AQIA trigger levels. These significance thresholds have been established to assist lead agencies in determining whether a project may have a significant air quality impact during the initial study. A project with emissions lower than the thresholds would not conflict with or obstruct implementation of the SDAPCD's air quality plans for attainment of the applicable NAAQS and CAAQS. As discussed in Section 5.1.5.2 below, the project would not exceed the construction operational related thresholds of significance for criteria pollutants and precursor emissions.

The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for ozone. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the ozone NAAQS. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the RAQS and SIP.

² Toxics Best Available Control Technology (T-BACT) means the most effective emission limitation or control device or technique which has been achieved in practice for that source or has been determined to be technologically feasible.

The RAQS and Attainment Plan rely on information from CARB and SANDAG to propose strategies for the reduction of source emissions through regulatory controls. CARB's source emission projections and SANDAG's growth projections are based on population, vehicle trends, and land use plans developed by the cities and by the County. As such, projects that propose development that are consistent with the growth anticipated by these land use plans would be consistent with the RAQS and Attainment Plan. The applicable land use plans in relation to the proposed project are the City's General Plan and the Kearny Mesa Community Plan.

The proposed project outlines a series of airside and landside improvements and modifications that would accommodate current aircraft and forecast demands. Collectively these improvements and modifications would provide safer air travel as well as economic benefits by modernizing and expanding the usable spaces to meet the forecast demand. It is not anticipated that the proposed project would result in an increase in demand for use of the Airport airside or landside facilities beyond the forecast growth in aviation and aviation related services in the San Diego region. The project would not result in regional growth of population or employment beyond that anticipated in the General Plan and Kearny Mesa Community Plan. Therefore, the project would not result in a regional increase in population and employment growth beyond the growth assumptions utilized in developing the RAQS and Attainment Plan.

5.1.4.2 Issue 2: Air Quality Standards

Would the proposed project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Implementation of the proposed project would generate criteria pollutants in the short-term during construction and the long-term during operation. To determine whether a project would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, emissions associated with the improvement projects included in the proposed airport plan were evaluated based on the quantitative emission thresholds established by the SDAPCD (as shown in Table 5.1-2).

Construction

Construction activities associated with the implementation of the airside and landside improvements under the proposed project would result in emissions of fugitive dust from demolition and site grading activities, heavy construction equipment exhaust, and vehicle trips associated with workers commuting to and from the site and trucks hauling materials. Improvement project task numbers 1 through 11 would establish or modify aviation easements and improvement project task numbers 1 through 14 would remove property from the airport; neither of these tasks would require physical construction activity. Construction emissions were modeled by activity type and each modeled activity includes the combined emissions resulting from construction of the proposed improvements listed in Table 3-6. The estimated maximum daily construction emissions are shown in Table 5.1-3, *Construction Criteria Pollutant and Precursor Emissions*. The emissions estimates assume compliance with SDAPCD Rule 55 via watering exposed areas a minimum of twice per day and limiting speeds to 15 mph on unpaved surfaces.

**Table 5.1-3
CONSTRUCTION CRITERIA POLLUTANT AND PRECURSOR EMISSIONS**

Improvement	Maximum Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase I Near-Term						
Runway Grooving	0.6	3.9	5.0	<0.1	0.2	0.15
Pavement Demolition	1.4	18.9	15.5	<0.1	6.7	1.7
New surface Grading	0.9	22.1	11.7	<0.1	5.2	2.0
New Surface Paving	2.8	6.0	4.8	<0.1	1.0	0.3
Pavement Rehabilitation	0.5	3.6	5.3	<0.1	0.3	0.1
Pavement Reconstruction	1.1	17.8	12.1	<0.1	2.5	0.9
Pavement Marking	25.2	5.2	4.9	<0.1	0.3	0.2
Hangar Construction	0.6	4.9	7.8	<0.1	0.4	0.2
Fencing, Seg. Circle & Windsock	<0.1	0.9	1.8	<0.1	<0.1	<0.1
Phase II Mid-Term						
New Surface Grading	0.9	23.8	12.7	0.1	6.0	2.2
New Surface Paving	2.3	6.7	5.2	<0.1	1.2	0.4
Pavement Rehabilitation	0.5	3.3	5.2	<0.1	0.2	0.1
Pavement Reconstruction	1.1	17.1	11.9	<0.1	2.5	0.9
Pavement Marking	47.2	5.2	4.8	<0.1	0.3	0.2
Hangar Construction	0.5	4.4	7.7	<0.1	0.3	0.2
Airfield Lighting & Perimeter Fencing	<0.1	0.8	1.8	<0.1	<0.1	<0.1
Phase III Long-Term						
New Surface Grading	0.8	21.4	12.3	0.1	5.7	2.1
New Surface Paving	1.9	6.3	5.1	<0.1	1.2	0.4
Pavement Demolition	2.2	25.0	22.0	<0.1	7.5	2.0
Pavement Marking	86.5	3.4	4.7	<0.1	0.2	0.1
Terminal Expansion	0.9	8.4	13.0	<0.1	0.3	0.2
Hangar Construction	0.5	4.1	7.5	<0.1	0.3	0.2
28R Lighting/Nav aids	<0.1	0.8	1.8	<0.1	<0.1	<0.1
Maximum Daily Emissions	86.5	25.0	22.0	0.1	7.5	2.2
<i>Screening Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
<i>Threshold exceeded?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Sources: HELIX 2025a; City 2022a.

ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns

As shown in Table 5.1-3, emissions of all criteria pollutants and precursors related to the implementation of the proposed project would be below the SDAPCD's screening thresholds. The maximum daily emissions shown assume all construction activities within each phase would occur sequentially (no overlap). If activities were to overlap, the maximum potential daily emissions would be the sum of the activities within a phase, resulting in a maximum of 93 pounds per day ROG during Phase III (threshold is 137 pounds per day); 83 pounds per day NO_x during Phase I (threshold is 250 pounds per day); and 69 pounds per day CO during Phase I (threshold is 250 pounds per day). No combination of overlapping construction activities would have the potential to result in emissions exceeding the SDAPCD's maximum daily thresholds.

Non-Flight Operations

Existing sources of non-aircraft related criteria pollutants and precursors associated with the operation of the Airport include mobile sources such as exhaust from visitor, pilot, employee, and vendor vehicles and area sources such as the use of landscape maintenance and aviation support equipment, and the use of consumer products and paint for cleaning and maintenance. The proposed terminal building expansion and new hangars would result in an increase in building energy and area sources of criteria pollutants and precursors. The potential increase in non-aircraft operational emissions resulting from the implementation of the project is shown in Table 5.1-4, *Operation Criteria Pollutant and Precursor Emissions (Non-Aircraft Related)*.

Table 5.1-4
OPERATION CRITERIA POLLUTANT AND PRECURSOR EMISSIONS (NON-AIRCRAFT RELATED)

Source	Maximum Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	0.5	0.3	3.9	<0.1	1.1	0.3
Area	14.4	0.2	21.0	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Total¹	14.9	0.6	25.0	<0.1	1.1	0.3
<i>Screening Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
<i>Threshold exceeded?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Sources: HELIX 2025a; City 2022a.

¹ Totals may not sum due to rounding.

ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns

As shown in Table 5.1-4, increases in non-aircraft operational emissions from the project would not exceed the SDAPCD's screening thresholds. Therefore, the project would not result in any new violation of an air quality standard or contribute substantially to an existing or projected air quality violation and the impact would be less than significant.

Aircraft-Related Operations

The potential increase in aircraft operational emissions resulting from the implementation of the project is shown in Table 5.1-5, *Operation Criteria Pollutant and Precursor Emissions (Aircraft Related)*.

Table 5.1-5
OPERATION CRITERIA POLLUTANT AND PRECURSOR EMISSIONS (AIRCRAFT RELATED)

Scenario	Maximum Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2037 Total Without Project Implementation	375.1	30.7	9,829.2	15.1	8.1	8.1
2037 Total With Project Implementation	376.2	30.9	9,916.8	15.2	8.7	8.7
Net Change¹	1.1	0.2	87.6	0.1	0.7	0.7
<i>Screening Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
<i>Threshold exceeded?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Sources: HMMH 2019; City 2022a.

¹ Totals may not sum due to rounding.

ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns

As shown in Table 5.1-5, increases in aircraft operational emissions from the project would not exceed the SDAPCD's screening thresholds.

Combined Operational Emissions

The potential combined increase in non-aircraft and aircraft operational emissions resulting from the project is shown in Table 5.1-6, *Combined Operation Criteria Pollutant and Precursor Emissions*.

Table 5.1-6
COMBINED OPERATION CRITERIA POLLUTANT AND PRECURSOR EMISSIONS

Source	Maximum Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Non-Aircraft	14.9	0.6	25.0	<0.1	1.1	0.3
Aircraft	1.1	0.2	87.6	0.1	0.7	0.7
Total¹	16.0	0.8	112.6	0.1	1.8	1.0
<i>Screening Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
<i>Threshold exceeded?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Sources: HELIX 2025a; HMMH 2019; City 2022a.

¹ Totals may not sum due to rounding.

ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns

As shown in Table 5.1-6, the combined increase in non-aircraft and aircraft operational emissions from the project would not exceed the SDAPCD's screening thresholds. Therefore, the project would not result in any new violation of an air quality standard or contribute substantially to an existing or projected air quality violation, and the impact would be less than significant.

5.1.4.3 Issue 3: Sensitive Receptors

Would the proposed project expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations?

This section includes an analysis of localized CO hotspots, as well as an assessment of TACs such as construction-related DPM emissions, construction-related asbestos and LBP emissions, and aircraft exhaust lead emissions.

Localized Carbon Monoxide Hot Spots

A CO hotspot is an area of localized CO pollution in excess of the NAAQS concentration limit that is typically caused by severe vehicle congestion on major roadways. Transport of the criteria pollutant CO is extremely limited; CO disperses rapidly with distance from the source under normal meteorological conditions. Under certain meteorological conditions, however, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Areas of high CO

concentrations, or “hot spots,” are typically associated with high volume intersections that are projected to operate at unacceptable LOS during the peak commute hours.³

Neither the City nor the SDAPCD have adopted screening methods for CO hotspots. The Bay Area Air Quality Management District (BAAQMD) provides screening guidance in their CEQA Guidelines concerning the volume of traffic which could result in a CO hotspot: intersections which carry more than 44,000 vehicles per hour; or intersections which carry more than 24,000 vehicles per hour and where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway) (BAAQMD 2023).

The project would not contribute traffic to a location where horizontal or vertical mixing of air would be substantially limited. All intersections affected by the project would include a mix of vehicle types that are not anticipated to be substantially different from the County average fleet mix, as identified in CalEEMod. According to the SANDAG Transportation Forecast Information Center, the busiest intersection in the project vicinity would be the intersection of Balboa Avenue and Kearny Villa Road which is forecast to carry 79,700 vehicle per day, or approximately 7,970 vehicles during the peak hour in 2035 (SANDAG 2019). The project's addition of 151 vehicles per day, or 15 vehicles during the peak hour, would result in the intersection carrying approximately 7,985 vehicles during the peak hour. This would be far below the screening level of 44,000 vehicles per hour. Therefore, the project's contribution to future traffic would not result in CO hotspots and the impact would be less than significant.

Toxic Air Contaminants

Construction Diesel Particulate Matter

Implementation of the project would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the TAC DPM. Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases such as hangar construction. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (CARB 2005).

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed amount of emissions would result in higher health risks. Construction activities for individual improvements, as part of the project implementation, are estimated to last approximately from a few weeks to six months. According to the OEHHA, health risk assessments (HRAs) used to determine the exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period; however, such

³ LOS is a measure to determine the effectiveness of transportation infrastructure. LOS is most commonly used to analyze intersections by categorizing traffic flow with corresponding safe driving conditions. LOS A is considered the most efficient level of service and LOS F the least efficient.

assessments should also be limited to the period/duration associated with construction activities which implement the proposed project. Thus, if the duration of potentially harmful construction activities near a sensitive receptor was six months, the exposure would be approximately 1.5 percent of the total exposure period used for typical health risk calculations. Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur intermittently and at various locations over the span of the 20-year implementation of the proposed AMP, implementation of the proposed project would not expose sensitive receptors to substantial construction-related DPM concentrations. Therefore, this impact would be less than significant.

Construction Asbestos and Lead Based Paint

Asbestos may be a component of building materials such as walls, ceilings, insulation, or fireproofing in older (pre-1979) buildings. Demolition or renovation of existing buildings on the project site could result in the disturbance of ACMs. In accordance with the SDAPCD Rule 1206, *Asbestos Removal, Renovation, and Demolition*, prior to commencement of renovation or demolition operations and prior to submitting the notifications required by Section (e) of Rule 1206, a facility survey shall be performed to determine the presence or absence of ACM, regardless of the age of the facility (SDPACD 2017). In addition, airborne asbestos is regulated in accordance with the National Emission Standards for Hazardous Air Pollutants asbestos regulations. Following notification of the SDAPCD and other applicable local agencies, and following identification of friable ACMs, SDAPCD Rule 1206, and federal and state Occupational and Safety Health Administration (OSHA) regulations, require that asbestos trained and certified abatement personnel perform asbestos abatement and that all ACM removed from the project site must be hauled to a licensed receiving facility and disposed of under proper manifest by a transportation company certified to handle asbestos. These regulations specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers.

LBP may be present in older (pre-1978 buildings). Demolition or renovation activities such as paint scraping and grinding or burning of material coated with LBP could result in the release of airborne lead particulate matter. The USEPA's Lead Renovation, Repair and Painting Rule (RRP Rule) requires that firms performing renovation, repair, and painting projects that disturb LBP in homes, child care facilities and pre-schools built before 1978 have their firm certified by USEPA (or an authorized state), use certified renovators who are trained by USEPA-approved training providers, and follow lead-safe work practices. Compliance with SDPACD, state, and federal regulations for agency notification and safe handling of ACM and LBP would ensure that project construction activities would not result in the exposure of sensitive receptors to substantial concentrations of airborne asbestos and the impact would be less than significant.

Aircraft Exhaust Lead

Piston-engine aircraft in the U.S. primarily burn one-hundred octane low-lead (100LL) aviation gasoline (avgas) which contains lead additives resulting in lead in the exhaust emissions of aircraft that use 100LL. In 2016, the FAA certified Swift Fuels 94 octane unleaded avgas (UL94) for use in some aircraft (those with a type certificate or supplemental type certificate to run on lower octane fuels). In 2024, UL94 became available at MYF. In September 2022, the FAA approved use of GAMI one-hundred octane unleaded (G100UL) avgas for all aircraft certified to use 100LL (although each individual aircraft is required to obtain a supplement type certificate to allow the use of G100UL; FAA

2025a). At the time of this analysis, G100UL was not available at MYF or at any other airport in southern California. Due to potential material compatibility issues with unleaded avgas and availability concerns, in April 2025, the FAA mandated that all airports that receive funding through the Airport Improvement Program grant assurances shall not restrict or prohibit the sale of 100 LL avgas until December 31, 2030 (FAA 2025b). Because 100LL will continue to be available at MYF until at least 2031, this analysis conservatively assumes that all piston-engine powered aircraft operations at the Airport would continue to use 100LL through the AMP planning horizon of 2037, and through the 30-year risk analysis exposure period.

Some of the proposed improvements in the AMP would result in changes to the aircraft taxi and flight patterns that could result in changes in localized concentration of lead from aircraft exhaust. As noted earlier, the improvement most likely to result in a change in flight patterns would be the removal of the existing Runway 28R displaced threshold, and the improvement that would result in a taxi pattern change would be the addition of new aircraft hangars and tiedown spaces east and north of the Sheraton Four Points Hotel. Localized concentrations of lead emissions from aircraft operations at the Airport were modeled using the Lakes AERMOD View and risks were evaluated using the CARB Air Dispersion Modeling and Risk Tool (ADMRT) program for No Project Conditions (2037 operations) and Project Conditions (2037 operations).

The list of OEHHA/CARB approved risk assessment health values for lead does not include any RELs for non-cancer chronic or acute health effects (CARB 2025e). Therefore, only cancer risks for exposure to aircraft lead exhaust are evaluated. The incremental excess cancer risk is an estimate of the chance a person exposed to a specific source of a TAC may have of developing cancer from that exposure beyond the individual's risk of developing cancer from existing background levels of pollutants in the ambient air. For context, the average cancer risk from pollutants in the ambient air for an individual living in an urban area of California is 830 in 1 million (CARB 2015). Cancer risk estimates do not mean, and should not be interpreted to mean, that a person will develop cancer from estimated exposures to toxic air pollutants. The only available T-BACT for aircraft lead exhaust emissions is for aircraft to use unleaded avgas which may not be feasible for all piston-engine powered aircraft. Therefore, cancer risks are compared to the more conservative 1 in 1 million without T-BACT threshold. The resulting change in incremental excess cancer risk between the Project and No Project conditions is shown in Table 5.1-7, *Aircraft Lead Exhaust Increased Incremental Excess Cancer Risk*. As shown in Table 5.1-7, the maximum change in incremental excess cancer risk for nearby sensitive receptors due to changes in concentrations of lead from aircraft exhaust resulting from implementation of the project would be 0.4 in 1 million and would not exceed the threshold risk of 1 in 1 million. The maximum change in incremental excess cancer risk would occur at receptor location R12, a multi-family residential building approximately 1.25 miles southeast of Runway 25R.

Table 5.1-7
AIRCRAFT LEAD EXHAUST INCREASED INCREMENTAL EXCESS CANCER RISK

Receptor ID	Receptor Description	No Project (2037)	Project (2037)	Change	Exceed 1 in 1 Million Threshold?
R1	Multi-Family residential	9.4	9.6	0.2	No
R2	Multi-Family residential	9.0	9.3	0.3	No
R3	Single-Family Residential	6.1	6.3	0.2	No
R4	Single-Family Residential	5.4	5.5	0.1	No

Receptor ID	Receptor Description	No Project (2037)	Project (2037)	Change	Exceed 1 in 1 Million Threshold?
R5	Single-Family Residential	4.7	4.7	<0.1	No
R6	Single-Family Residential	1.8	2.1	0.3	No
R7	Multi-Family residential	0.8	0.9	0.1	No
R8	Multi-Family residential	0.9	0.9	<0.1	No
R9	Single-Family Residential	1.5	1.5	<0.1	No
R10	Single-Family Residential	0.8	0.8	<0.1	No
R11	Multi-Family residential	0.9	0.9	<0.1	No
R12	Multi-Family residential	4.0	4.4	0.4	No
S1	Wegeforth Elementary School	1.4	1.4	<0.1	No
S2	Soille San Diego Hebrew Day School	1.0	1.2	0.2	No
S3	La Petite Ecole du Lycée Français de San Diego	0.8	1.1	0.3	No
S4	Angier Elementary School	0.7	0.8	0.1	No
S5	SET High School	0.4	0.5	0.1	No
D1	Montessori School of Kearny Mesa	2.7	2.8	0.1	No
D2	Imagine Montessori Bilingual Preschool	0.8	0.9	0.1	No

Source: HELIX 2025a

Other long-term operational emissions include toxic substances such as cleaning agents in use on site, compliance with State and federal handling regulations would ensure that emissions remain below a level of significance. The use of such substances such as cleaning agents is regulated by the 1990 Federal CAA Amendments as well as State-adopted regulations for the chemical composition of consumer products. Therefore, long-term operation of the Airport would not result in the exposure of sensitive receptors to substantial pollutant concentrations and the impact would be less than significant.

5.1.4.4 Issue 4: Odors

Would the proposed project create objectionable odors affecting a substantial number of people?

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

Implementation of the project could produce odors during construction activities resulting from diesel equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. Accordingly, the construction activities related to implementation of the project would not create objectionable odors affecting a substantial number of people.

Existing operation of the Airport could be an occasional source of some odors including from vehicle exhaust, aircraft refueling, and solid waste collection. Implementation of the project would not substantially change existing sources of odors from Airport operation. Therefore, long-term operation of the Airport under the project would not create objectionable odors affecting a substantial number of people.

5.1.5 Significance of Impacts

5.1.5.1 Conflict with Air Quality Plan

The project would not conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP. Therefore, impacts would be less than significant.

5.1.5.2 Air Quality Standards

Criteria pollutant and precursor pollutant emissions generated during construction, non-flight-related operational activities, and aircraft-related operational activities associated with the project would not exceed the SDAPCD screening thresholds. Therefore, the project would not result in any new violation of an air quality standard or contribute substantially to an existing or projected air quality violation, and the impact would be less than significant.

5.1.5.3 Sensitive Receptors

Construction of the proposed improvements within the project would not expose sensitive receptors to substantial concentrations of DPM, asbestos, lead or other TACs. Long-term operation of the Airport would not result in significant increased incremental excess cancer risks to sensitive receptors from localized concentrations of lead in aircraft exhaust, or from long-term emissions of other toxic substances. Therefore, implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations and the impact would be less than significant.

5.1.5.4 Odors

Construction activities associated with implementation of the proposed project would not create objectionable odors affecting a substantial number of people. Implementation of the proposed AMP would not substantially change existing sources of odors from Airport operation. Therefore, impacts associated with odors would be less than significant.

5.1.6 Mitigation Framework

Air quality impacts would be less than significant; therefore, no mitigation measures are required.

5.2 Biological Resources

This section of the PEIR addresses potential impacts to biological resources that could result from implementation of the AMP. Information in this section is based on the *Montgomery-Gibbs Executive Airport Master Plan Update Biological Technical Report* (HELIX 2025b), which is included as Appendix D of this PEIR.

5.2.1 Existing Conditions

The existing environmental setting, which includes a detailed discussion and description of existing biological resources within the AMP area is contained in Section 2.4.2 of this PEIR. Section 4.2 of this PEIR includes a summary of the regulatory framework relative to biological resources. Additional relevant information is provided below.

5.2.2 Methodology and Assumptions

This PEIR addresses the proposed AMP at a programmatic level, rather than a specific project; therefore, the analysis of biological resources for the AMP area was performed at the plan level, using existing databases and literature and supplemented by a site visit, as described in the following sections.

5.2.2.1 Literature Review

Baseline biological resources information for the AMP area was reviewed and compiled from several sources including the City's Revised Final VPHCP (City 2019), the City's MSCP SAP (City 1997), the CDFW California Natural Diversity Database (CNDDDB; CDFW 2019), USFWS sensitive species database (USFWS 2019), and biological reports for various projects, including the Resource Management Plan for Montgomery Field Airport (P&D Environmental 1998), biological reports for West and Northwest Areas of Montgomery Field Airport (RECON Environmental [RECON] 2008), the Montgomery Field Runway Extension Project (HELIX Environmental Planning, Inc. [HELIX] 2009-2013, and 2016), Montgomery Field Localizer Project (Merkel and Associates 2015), and Montgomery Field Reconstruct 5-23 and Taxiway G Project (Rocks Biological 2013). Soils data were obtained from the U.S. Department of Agriculture Web Soil Service (United States Department of Agriculture [USDA] 2019). The working paper for the project (Atkins 2017) was also used as a resource. The City also provided several additional relevant reports (RECON 2022, Hughey 2022, City 2020, USFWS 2014).

5.2.2.2 General Biological Survey

The baseline data was supplemented with a single site reconnaissance conducted by HELIX Environmental Planning, Inc. [HELIX] on June 8, 2017, to verify and update previous vegetation mapping, note the presence of any additional sensitive species observed, and conduct habitat assessments for sensitive species. Vegetation communities were mapped on an aerial photograph (1" = 100' scale) with overlaid topography. A list of plant and animal species observed or detected within the AMP area was prepared. Plant species were identified in the field or later in the laboratory with the aid of botanical keys. Animals were identified in the field by direct visual observation with the aid of binoculars or indirectly by detection of calls, tracks, burrows, or scat. Focused surveys

were not conducted as part of the field effort for this AMP, although results of biological surveys from various projects conducted at the airport over the past several years have been incorporated, to the extent available.

5.2.2.3 Jurisdictional Delineation

Jurisdictional delineations are used to identify and map water and wetland resources potentially subject to USACE jurisdiction pursuant to Section 404 of the CWA (33 USC 1344), RWQCB jurisdiction pursuant to Section 401 of the CWA and/or Porter-Cologne Water Quality Act, and streambed habitats potentially subject to CDFW jurisdiction pursuant to Sections 1600 et seq. of the CFG Code.

A formal jurisdictional delineation of the AMP area was not conducted as part of HELIX's general biological survey conducted in 2017. Previous studies have been used to depict potential jurisdictional resources on site (RECON 2008; City 2019), in combination with vegetation mapping of wetland habitats, and are adequate for purposes of this PEIR to determine program-level impacts. The vernal pool boundaries were obtained from the VPHCP (City 2019) and HELIX (2016), while potential non-wetland waters in the western portion of the site are from RECON (2008). The potential limits of jurisdiction for non-vernal pool wetland habitats in the eastern portion of the site were based on the results of vegetation mapping and input from City airport biologists. It is anticipated that an updated jurisdictional delineation would be needed for future projects with the potential to impact jurisdictional resources to best reflect ground conditions once additional details are available for individual project improvements.

5.2.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2022a), which have been adapted to guide a programmatic analysis for the proposed project, impacts on biological resources would be significant if the proposed project would result in:

1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by CDFW or USFWS;
2. A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;
3. A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites; or
5. A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.

5.2.4 Impact Analysis

Biological resources may be either directly or indirectly impacted by improvements associated with the AMP. Furthermore, direct and indirect impacts may be either permanent or temporary in nature. Direct and indirect impacts are defined per the City's CEQA Significance Determination Thresholds (City 2022a).

Direct Impacts: A direct impact is a physical change in the environment that is caused by and immediately related to the project. An example of a direct physical change in the environment is the removal of vegetation due to brushing, grubbing, grading, trenching, or excavating.

Indirect Impacts: An indirect impact is a physical change in the environment that is not immediately related to the project, but which is caused indirectly by the project. If a direct impact in turn causes another physical change in the environment, then the secondary change is an indirect impact. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact that may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable. Potential indirect impacts may include the following:

- *Noise:* Elevated ambient noise levels that could result from development associated with the proposed AMP's implementation (construction), could impact species that rely on sound to communicate (e.g., birds). Elevated ambient noise levels have potential to disturb species and/or cause direct habitat avoidance. The impact of noise on wildlife differs from species to species and is dependent on the source of the noise (e.g., vehicle traffic versus blasting) and the decibel level, duration, and timing.
- *Changes in Hydrology:* Changes in surface or ground hydrology, such as those related runoff, salinity levels, and sedimentation resulting from the implementation of the proposed AMP, could have indirect impacts on species dependent on surface water species.
- *Invasive Exotic and Predator Species:* Introduction of exotic plant and animal species to MHPA areas adjacent to the AMP area could be considered an indirect impact as such species have fewer natural predators or other ecological controls on their population sizes, and they often thrive in disturbed habitats. Exotic plant and wildlife species may aggressively outcompete native species.
- *Lighting:* Artificial night lighting associated with implementation of the proposed AMP could impact habitat value for some species, particularly for nocturnal species, through potential modification of predation rates, obscuring of lunar cycles, and/or causing direct habitat avoidance. Nighttime lighting could also disturb diurnal species roosting in adjacent habitat.
- *Toxins and Fugitive Dust:* Increased use of chemical products including pesticides, herbicides, and machinery fluids along with fugitive dust generated during construction and operation of the Airport (i.e., from aerosolized soil, tire wear, and car exhaust) associated with the implementation of the proposed AMP could adversely impact plants and animals by coating the plant surfaces and disrupting various plant and animal lifecycle functions such as reproduction, photosynthesis, and respiration.

- **Unauthorized Access:** Development associated with implementation of the proposed AMP could create or increase use of habitats that otherwise were not easily accessible to humans. Disturbance from human activities (i.e., trampling of species from recreational activity) and trash left by human activities can adversely impact species and degrade habitat.

Permanent Impacts: Impacts that result in the irreversible removal or loss of biological resources are considered permanent.

Temporary Impacts: Per the City's Biology Guidelines, temporary disruptions of habitat and temporary staging areas that do not alter landform and that will be revegetated are generally not considered to be permanent habitat loss. Any impact that will last for only a limited amount of time and is considered to have reversible effects on biological resources can be viewed as temporary. This includes impacts related to construction activities. Temporary impacts would be revegetated in accordance with City revegetation guidelines.

5.2.4.1 Sensitive Species

Would the proposed project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Sensitive Plant Species

As discussed in Chapter 2.0 of this PEIR, sensitive plant species are those that are considered federal, State, or CNPS rare, threatened, or endangered; MSCP Covered Species; or MSCP Narrow Endemic species.

A search of CNDDDB, USFWS, and MSCP databases returned records of 10 sensitive species reported within 1,000 feet of the AMP area. These species, as well as City Narrow Endemic species, were individually analyzed for potential to occur within the AMP area based on the presence of suitable habitat (e.g., vegetation communities, soils, elevation, and geographic range, life form, blooming period, etc.).

As a result of a general biological survey, a review of prior surveys of the airport property conducted by others, and searches of the USFWS, CNDDDB, and MSCP, it was determined that there are eight sensitive plant species documented within the AMP area, some of which may be extant in the AMP area, while others may no longer be present. Of these eight, three are federally and/or state listed plant species that have been recorded on the site: the federally and state listed endangered San Diego button-celery and San Diego mesa mint, and the federally listed threatened spreading navarretia. The San Diego mesa mint has been documented on the site; however, the San Diego button-celery and the spreading navarretia have not been documented on the site since 1979 and the City's 2019 VPHCP does not show either species occurring on the site; therefore, they may no longer be present within the AMP.

Five other sensitive plant species have been recorded in the AMP area: the coast barrel cactus; Orcutt's brodiaea; San Diego goldenstar; Nuttall's scrub oak; and graceful tarplant. All five of these species have either been observed in recent surveys or are presumed to be extant.

Implementation of future projects under the AMP would result in direct impacts to San Diego mesa mint, graceful tarplant, and Nuttall's scrub oak, and potential impacts to Orcutt's brodiaea and San Diego goldenstar. San Diego mesa mint occurring in a single vernal pool would be impacted due to the new hold bay at Taxiway A to the west (associated with the Future Runway 28R Threshold). Populations of graceful tarplant within a 19.8-acre area of non-native grassland would be impacted in the west and southwestern portion of the AMP area. Five individuals of Nuttall's scrub oak would be directly impacted in the southwest portion of the AMP area. Currently there are no Orcutt's brodiaea or San Diego goldenstar observations within the AMP impact area. However, these species do occur on site and there is the potential for impacts to these species from construction of the MALSRL lighting.

Generally, impacts to plant species with a CNPS CRPR of 1 or 2 are considered potentially significant. CRPR 3 and 4 species are relatively widespread and impacts to such species would not substantially reduce their populations in the region and are not significant.

San Diego mesa mint is a federally and state endangered species and City narrow endemic. It is also a CRPR List 1B.1 species and is a covered species under the VPHCP. The VPHCP states that two vernal pools containing San Diego mesa mint may be impacted at MYF due to FAA regulations. Although the impact footprint has been minimized such that the AMP would impact only a single vernal pool supporting this species, these impacts are considered significant in accordance with the City's Significance Determination Thresholds (City 2022a), which states that impacts to state or federally listed species and narrow endemics should be considered significant.

Graceful tarplant is a CRPR 4.2 species and is widespread in the western portion of the site where it has been documented within a 72.5-acre area. A total of 72 percent (52 acres) of the area known to support this species within the AMP area would be avoided by implementation of the AMP. Therefore, impacts to this species are not considered significant.

Although a CRPR 1B.2 species, Nuttall's scrub oak is widely distributed within the City, with many of the records concentrated in the Los Peñasquitos Canyon Preserve located north of the AMP area (CalFlora 2019). Proposed impacts to five Nuttall's scrub oak individuals are considered less than significant because of the low number of individuals affected, and such impacts would not jeopardize the status of the species in the region or result in future elevated listing of the species. Therefore, impacts to this small number of Nuttall's scrub oak individuals are not significant.

Orcutt's brodiaea is a CRPR 1B.1 species and is a covered species under the City's MSCP. While no known observations of this species overlap with the future projects to be implemented under the AMP, there is potential that this species could be impacted by construction of the MALSRL lighting due to nearby known occurrences on MYF and the presence of suitable habitat. The MALSRL lighting impact footprint consists of small, discrete areas spaced apart at regular intervals in the eastern portion of the site, and it is expected that any potential impacts to Orcutt's brodiaea would be to small numbers of individuals. These impacts would be less than significant given the small areas affected, combined with avoidance of the known population of hundreds of individuals west of the runway and other scattered observations near onsite vernal pools. Potential impacts to small numbers of individuals would not jeopardize the status of the species in the region or result in future elevated listing of the species.

San Diego goldenstar is a CRPR 1B.1 species and is a covered species under the City's MSCP. While no known observations of this species overlap with the future projects to be implemented under the AMP, there is potential that this species could be impacted by construction of the MALSR lighting due to its known occurrence in other parts of MYF and the presence of suitable habitat. The MALSR lighting impact footprint consists of small, discrete areas spaced apart at regular intervals in the eastern portion of the site, and it is expected that any potential impacts to San Diego goldenstar would be to small numbers of individuals. These impacts would be less than significant given the small areas affected, combined with avoidance of the known populations in the MHPA in the northeastern portion of MYF and conservation of major populations of this species elsewhere in the MHPA. Potential impacts to small numbers of individuals would not jeopardize the status of the species in the region or result in future elevated listing of the species.

Other sensitive plant species known from or with high potential to occur in the AMP area are expected to be avoided by project activities.

Sensitive Wildlife Species

Sensitive wildlife species are those that are considered federal or state threatened or endangered; MSCP Covered Species; or MSCP Narrow Endemic species.

A species is also considered sensitive if it is included on the CDFW's Special Animals List as a candidate for federal or State listing, State Species of Special Concern (SSC), State Watch List (WL) species, State Fully Protected species, or federal Bird of Conservation Concern (Appendix D). Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss.

In addition, active nests of most bird species, regardless of sensitivity status, are protected by the federal MBTA and CFG Code. Note that the AMP is required to adhere to the MBTA and CFG Code statutes regarding protection of avian nesting.

As a result of the results of a general biological survey, a review of previous airport surveys by others, and searches of the USFWS listed species database and CNDDB, it was determined that there are 16 sensitive wildlife species documented in the AMP area. Of these 16, four are federally listed animal species: coastal California gnatcatcher; least Bell's vireo; San Diego fairy shrimp, and western spadefoot. HELIX detected both the coastal California gnatcatcher and the least Bell's vireo onsite, and San Diego fairy shrimp and western spadefoot have been documented onsite in various biological surveys.

The additional 12 sensitive species documented onsite include the BUOW, California horned lark, Cooper's hawk, Coronado skink, loggerhead shrike, northern harrier, orange-throated whiptail, San Diego desert woodrat, coast horned lizard, sharp-shinned hawk, southern California rufous-crowned sparrow, and the white-tailed kite. A single BUOW was observed repeatedly in and adjacent to a burrow in the southwestern portion of the site in 2007 and while no other owls have been observed onsite during surveys, there is habitat to support the species and thus, there is the potential for the BUOW to occur onsite. Given that there is suitable habitat to support the remaining 11 sensitive species, all 12 are considered to have a moderate to high potential to occur on site. In addition, Crotch's bumblebee has a moderate potential to occur onsite.

Implementation of future projects under the AMP would result in direct impacts to habitats occupied or suitable for San Diego fairy shrimp, coastal California gnatcatcher, BUOW, orange-throated whiptail, coast horned lizard, Coronado skink, western spadefoot, Cooper's hawk, sharp-shinned hawk, southern California rufous-crowned sparrow, northern harrier, white-tailed kite, horned lark, loggerhead shrike, San Diego desert woodrat, and Crotch's bumble bee. These habitats include vernal pool, Diegan coastal sage scrub, and non-native grassland. Such impacts would be a result of vegetation removal associated with clearing, grubbing, and grading for the AMP, which could cause loss of habitat and/or direct injury or mortality to individuals. Additionally, implementation of the AMP would impact locations where San Diego fairy shrimp, coastal California gnatcatcher, and the BUOW have been documented on site. The project would not impact habitat for the least Bell's vireo and this species is not expected to breed onsite given the limited acreage of potentially suitable habitat (southern willow scrub), lack of connectivity to more extensive riparian resources, and the overall distance from other potentially suitable offsite habitat.

Impacts would occur in eight locations where San Diego fairy shrimp have been documented on site, consisting of seven locations outside the MHPA in the southwestern portion of the site, and one location in the MHPA in the eastern portion of the site. The impacted pool in the MHPA may be removed from the MHPA by a Boundary Line Adjustment (BLA), as discussed in Section 5.2.4.5. Additional San Diego fairy shrimp individuals could be impacted as well if the species is found to occupy more locations on site in the future. Impacts to San Diego fairy shrimp are therefore considered potentially significant.

Impacts would occur to Diegan coastal sage scrub where coastal California gnatcatcher has been observed in the eastern portion of the AMP area. Impacts to suitable habitat total 0.5 acre, composed of 0.1 acre of permanent impact to Diegan coastal sage scrub, less than 0.1 acre permanent impact to baccharis scrub, 0.4 acre of temporary impact to Diegan coastal sage scrub, and less than 0.1 acre temporary impact to baccharis scrub. Impacts to coastal California gnatcatcher are therefore considered potentially significant.

Direct impacts to BUOW are not anticipated as this species is not known to occupy the site and the single documented occurrence of this species during the breeding season was in 2007. Other observations of this species have occurred during the wintering season. However, since suitable habitat is present and the species has potential to occupy the site in the future, impacts are considered potentially significant.

Potential impacts to the MSCP-covered southern California rufous-crowned sparrow, northern harrier, Cooper's hawk, coast horned lizard, and orange-throated whiptail from removal of 25.2 acres (22.8 acres permanent and 2.4 acres temporary) of sensitive upland habitats that may support these species are not considered significant due to the adequate species coverage and suitable habitats protected under the MSCP within the MHPA. A total of 24.4 acres (97 percent) of the AMP impacts to sensitive upland habitats would occur outside the MHPA.

Potential impacts to Coronado skink, loggerhead shrike, horned lark, white-tailed kite, sharp-shinned hawk, and San Diego desert woodrat (species not covered by the MSCP) by removal of 25.2 acres (22.8 acres permanent and 2.4 acres temporary) of sensitive upland habitats would be less than significant due to the small number of individuals potentially affected, the relatively small amount of habitat impacted, and the remaining suitable habitat in the AMP area, MHPA, and adjacent conserved lands.

Potential impacts to western spadefoot from project effects on 0.54 acre of vernal pool are not considered significant given the extensive conservation of high-quality vernal pools within the MHPA on site. Most pool impacts associated with the AMP are to lower quality pools outside the MHPA in the western portion of the site, which are within areas that are regularly mowed and maintained as part of standard airport operations.

Crotch's bumble bee has low potential to use the airfield due to limited presence of suitable floral resources combined with regular mowing of these areas, which removes the limited nectar resources that may be present. Regular mowing of the airfield is required for airport operation safety. This species has a moderate potential to occur in MHPA lands within the AMP area, as well as in adjacent native scrub habitat outside the MHPA in the southeastern part of the AMP area. Significant impacts to Crotch's bumble bee could occur if this species were directly impacted from project implementation. Construction of the MALSR lighting in the southeastern portion of the AMP area is anticipated to be the only AMP component with moderate potential to impact this species. Based on the proposed implementation of this component, impacts to Crotch's bumble bee are considered potentially significant. Individual projects will conduct habitat assessments and surveys, as applicable, on a case-by-case basis, in accordance with MM BIO-8.

Significant impacts also could occur if nesting birds, including raptors, were directly impacted by project implementation through habitat modification and/or removal.

Potentially significant indirect impacts to sensitive species resulting from lighting would be avoided through the following project design features: lighting within the proposed project footprint adjacent to undeveloped habitat would be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from these areas to the extent allowable under FAA regulations. Furthermore, lighting is already present on the airport site and additional lighting is not anticipated to have a significant impact. With the implementation of these features, no significant impact from lighting would occur.

Short-term noise effects during construction could result in significant impacts to coastal California gnatcatcher nesting in the MHPA, nesting BUOWs, or nesting northern harrier.

5.2.4.2 Sensitive Habitats

Would the proposed project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development Manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

A total of 11 vegetation communities (including land cover types) were recorded within the AMP area, covering approximately 487.3 acres. They include three wetland habitat types (southern willow scrub [including a disturbed phase], disturbed wetland, and vernal pool), and eight upland habitat/land cover types (Diegan coastal sage scrub [including a disturbed phase], baccharis scrub [including a disturbed phase], chamise chaparral, non-native grassland, eucalyptus woodland, disturbed habitat, non-native vegetation, and developed).

Of the 487.3 acres within the AMP area, approximately 64.4 acres (13 percent) would be directly impacted by future implementation of individual projects under the AMP (Table 5.2-1, *AMP Impacts*

to Vegetation and Land Cover Types; Figure 5.2-1a, *Project Impacts/Vegetation and Sensitive Biological Resources – West*; Figure 5.2-1b, *Project Impacts/Vegetation and Sensitive Biological Resources - East*), including 19.8 acres of temporary impacts and 44.5 acres of permanent impacts. These impacts include 0.541 acre of wetland habitat (vernal pool; 0.007 acre temporary and 0.47 acre permanent) and 25.2 acres of sensitive uplands.

Total impacts (temporary and permanent) to sensitive vegetation communities (wetlands and uplands) is 25.7 acres, composed of 0.54 acre of vernal pool, 0.5 acre of sage scrub, less than 0.1 acre of baccharis scrub, less than 0.1 acre of chamise chaparral, and 24.7 acres of non-native grassland (Table 5.2-1). These impacts would be considered significant and would require mitigation at ratios prescribed by the City's Biology Guidelines. Significant impacts also could occur if the project were to impact lands outside of the approved impact footprint, either directly through habitat removal, or indirectly through runoff, sedimentation, fugitive dust, or other edge effects.

Table 5.2-1
AMP IMPACTS TO VEGETATION AND LAND COVER TYPES (acres)¹

Vegetation Community or Land Cover Type	Tier	Existing Acreage	Temporary Impacts ³		Permanent Impacts		Total Impacts ⁴		TOTAL
			Inside MHPA	Outside MHPA	Inside MHPA	Outside MHPA	Inside MHPA	Outside MHPA	IMPACTS
Wetland									
Southern willow scrub (63320) ² – incl disturbed	Wetland	1.17	--	--	--	--	--	--	--
Disturbed wetland (11200)	Wetland	0.46	--	--	--	--	--	--	--
Vernal pool (44000)	Wetland	9.28	0.07	<0.01	0.18 ⁵	0.29	0.25	0.29	0.54
Wetland Subtotal		10.91	0.07	<0.01	0.18	0.29	0.25	0.29	0.54
Sensitive Upland									
Diegan coastal sage scrub (32500) – incl disturbed	II	97.8	0.3	0.1	0.1	< 0.1	0.4	0.1	0.5
Baccharis scrub (32530) – incl disturbed	II	11.2	< 0.1	--	< 0.1	--	0.1	--	<0.1
Chamise chaparral (37200)	IIIA	5.4	--	<0.1	--	--	--	0.1	<0.1
Non-native grassland (42200)	IIIB	155.5	0.3	1.7	0.1	22.6	0.4	24.3	24.7
Sensitive Upland Subtotal		269.9	0.6	1.8	0.2	22.6	0.8	24.4	25.2
Non-Sensitive Upland									
Eucalyptus woodland (79100)	IV	0.5	--	< 0.1	--	--	--	< 0.1	< 0.1
Disturbed habitat (11300)	IV	48.3	0.1	2.6	0.2	8.7	0.3	11.3	11.6
Non-native vegetation (11000)	--	0.2	--	--	--	--	--	--	--
Developed (12000)	--	157.5	0.4	14.3	< 0.1	12.4	0.4	26.7	27.1
Non-Sensitive Upland Subtotal		206.5	0.5	16.9	0.2	21.1	0.7	38.0	38.7
TOTAL		487.3	1.17	18.70	0.58	43.99	1.75	62.69	64.44

¹ Totals reflect rounding (0.1 for uplands and 0.001 for wetlands). If no impacts, shown as "--".

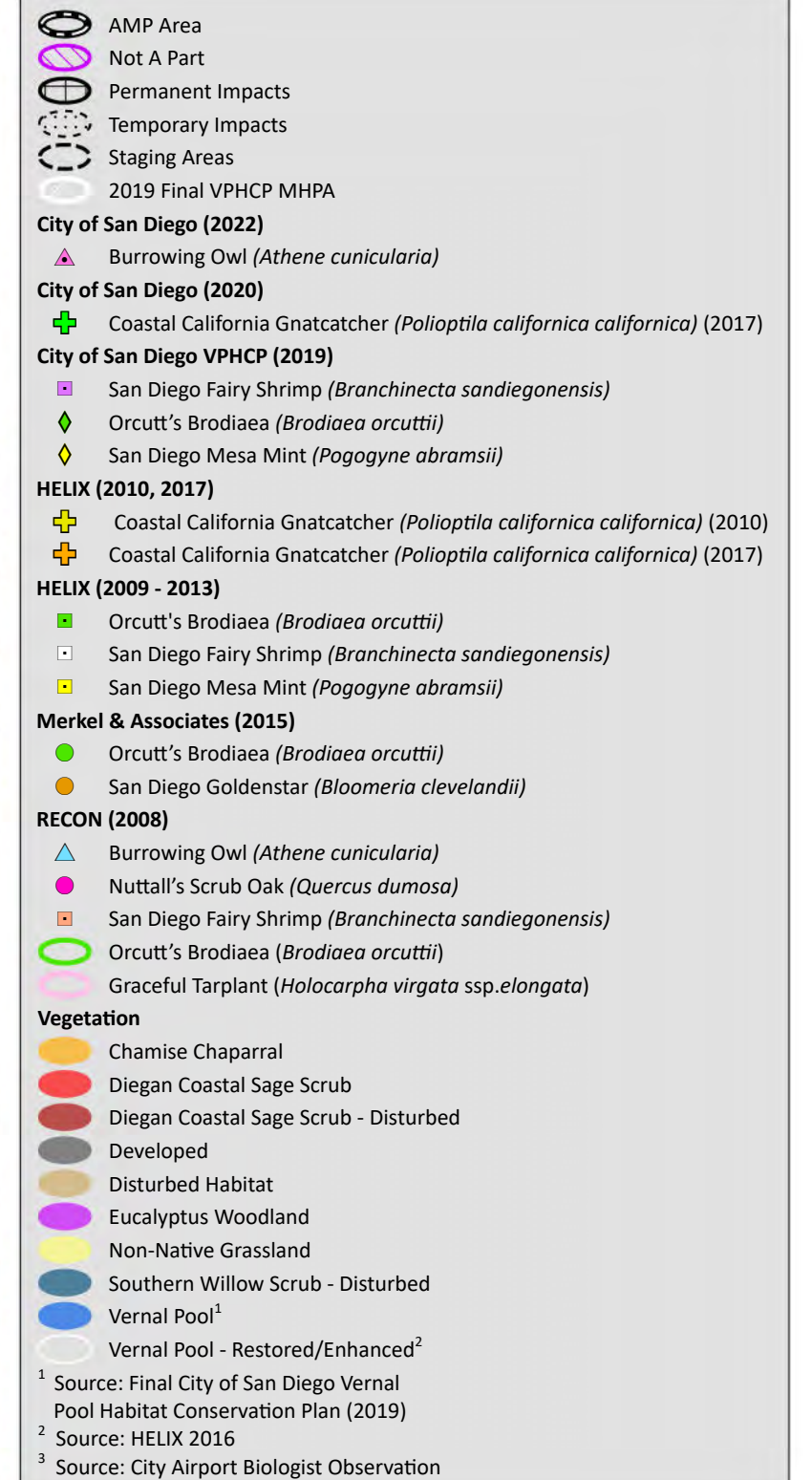
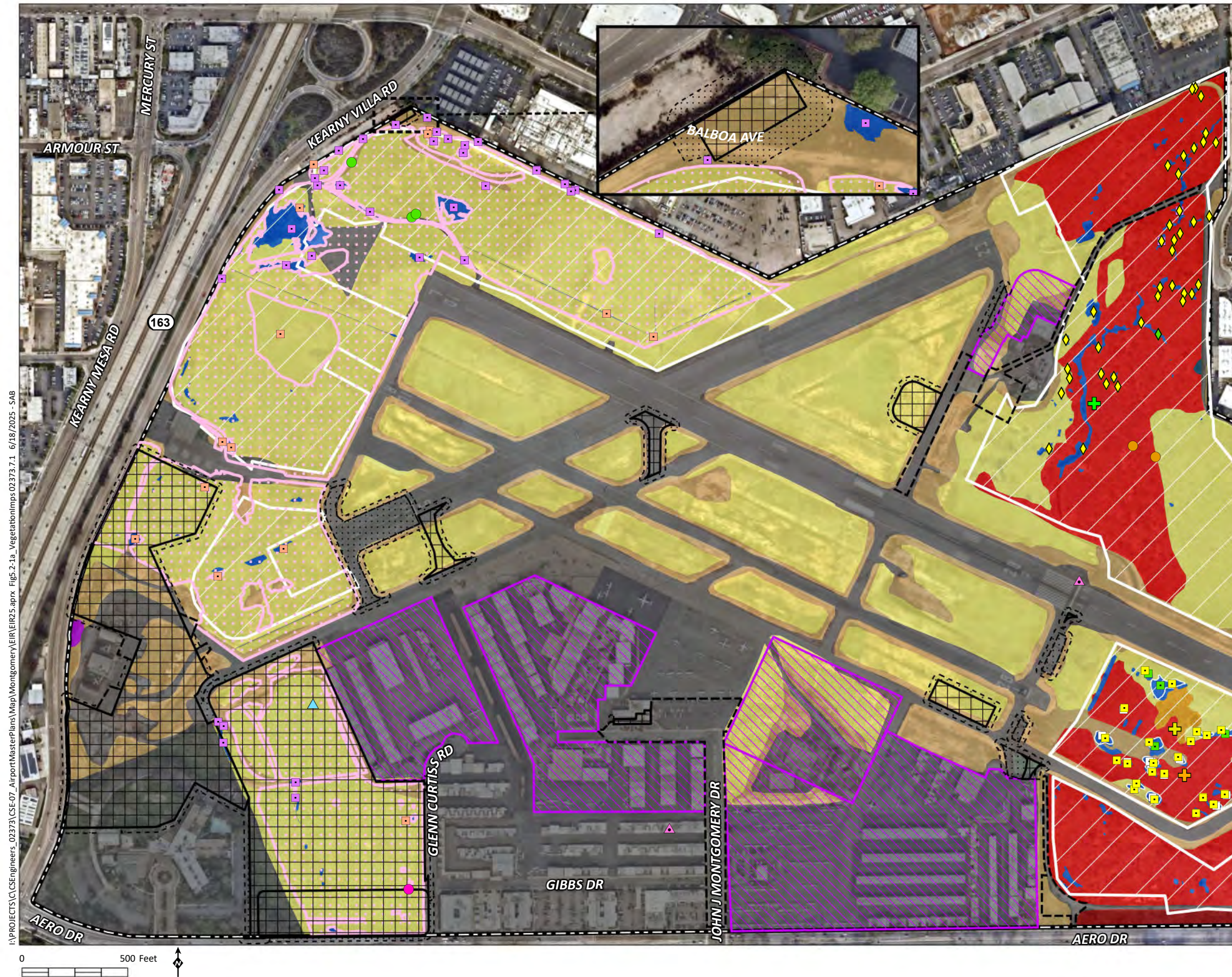
² Codes refer to Oberbauer 2008.

³ Includes temporary construction impacts and construction staging areas.

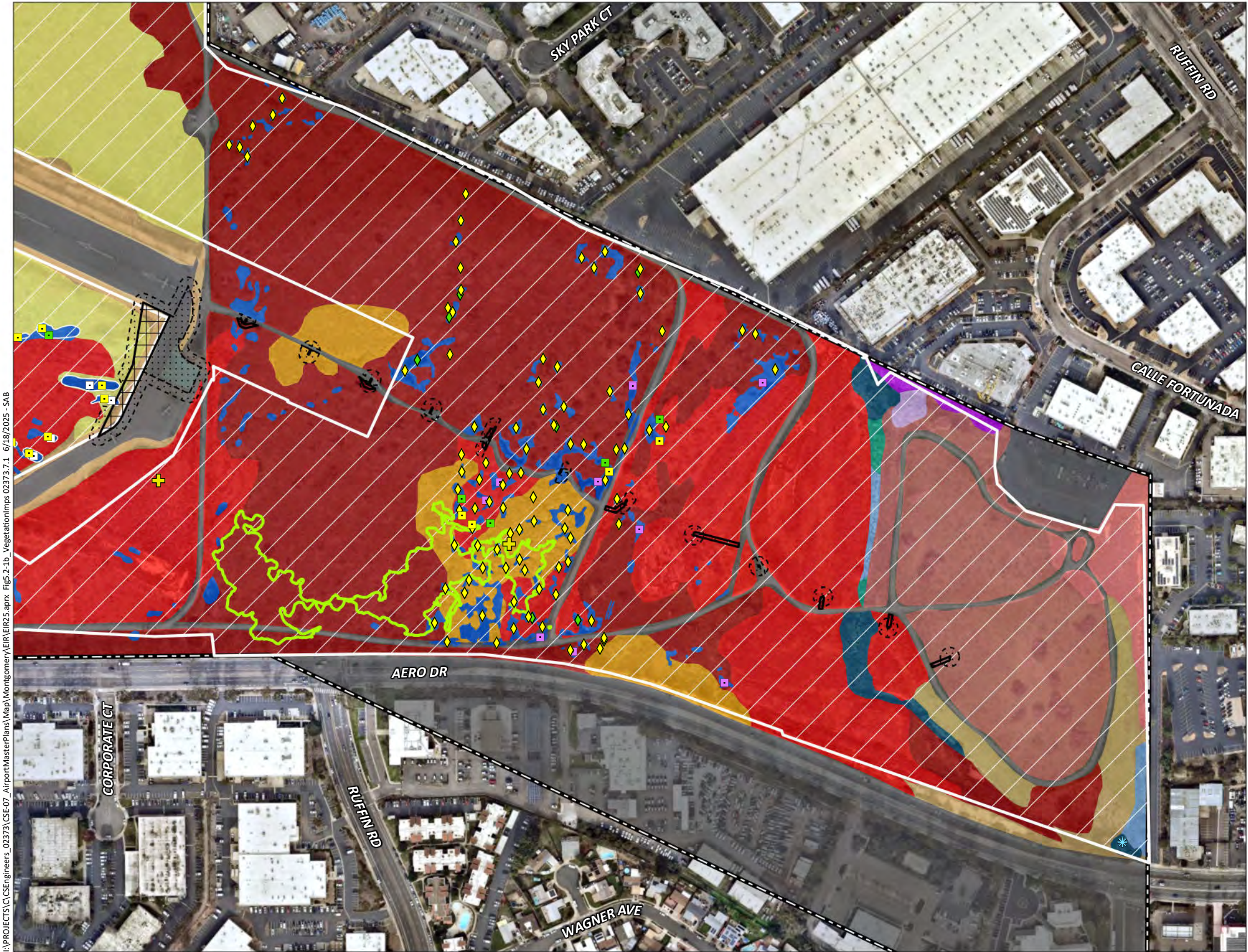
⁴ Permanent and temporary impacts combined.

⁵ If a vernal pool is partially impacted the entire pool is counted as impacted herein.

MHPA = Multi-habitat Planning Area



Source: Aerial (SanGIS, 2023).



AMP Area

Permanent Impacts

Temporary Impacts

2019 Final VPHCP MHPA

City of San Diego (2024)

San Diego Goldenstar (*Bloomeria clevelandii*)

City of San Diego VPHCP (2019)

San Diego Fairy Shrimp (*Branchinecta sandiegonensis*)

Orcutt's Brodiaea (*Brodiaea orcuttii*)

San Diego Mesa Mint (*Pogogyne abramsii*)

City of San Diego (2017)³

Least Bell's Vireo (*Vireo bellii pusillus*)

HELIX (2010, 2017)

Coastal California Gnatcatcher (*Polioptila californica californica*) (2010)

HELIX (2009 - 2013)

Orcutt's Brodiaea (*Brodiaea orcuttii*)

San Diego Fairy Shrimp (*Branchinecta sandiegonensis*)

San Diego Mesa Mint (*Pogogyne abramsii*)

Vegetation

Baccharis Scrub

Baccharis Scrub - Disturbed

Chamise Chaparral

Diegan Coastal Sage Scrub

Diegan Coastal Sage Scrub - Disturbed

Developed

Disturbed Habitat

Disturbed Wetland

Eucalyptus Woodland

Non-Native Grassland

Non-Native Vegetation

Southern Willow Scrub

Southern Willow Scrub - Disturbed

Vernal Pool¹

Vernal Pool - Restored/Enhanced²

1 Source: Final City of San Diego Vernal Pool Habitat Conservation Plan (2019)

2 Source: HELIX 2016

3 Source: City Airport Biologist Observation

Source: Aerial (SanGIS, 2023).

HELIX
Environmental Planning

Project Impacts/ Vegetation and Sensitive Biological Resources - East

Figure 5.2-1b

5.2.4.3 Wetlands

Would the proposed project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

Implementation of future projects under the AMP would result in direct impacts to vernal pools and potential non-wetland waters/streambed. Vernal pool impacts total 0.541 acre, consisting of 0.47 acre of permanent impact and 0.073 acre of temporary impact (Figure 5.2-2, *Project Impacts/Potential Jurisdictional Waters and Wetlands*). Based on a 2008 delineation, approximately 133 linear feet of non-wetland waters/streambed in the western portion of the AMP area would be impacted. Acreage for this area was not available but is expected to be minimal (less than 0.05 acre). An additional 1,704 linear feet of potential non-wetland waters/streambed/swales identified by the City's Airport Biologist could also be impacted; these features have not been formally delineated. An updated jurisdictional delineation would determine the acreage of impact to non-vernal pool waters at the time of future project implementation. Vernal pools may be considered wetland waters of the U.S. by the USACE/RWQCB and wetlands by the City. The non-wetland waters may be considered non-wetland waters of the U.S. by the USACE/RWQCB and stream channel by CDFW.

Vernal pool impacts would occur primarily in the southwestern portion of the site, in areas supporting lower quality pools that are outside of the MHPA. Two pools within the MHPA in the eastern portion of the site would be impacted: one impact would occur from installation of the MALSR lighting and the other from the new hold bay at Taxiway A. The pool to be impacted by the new hold bay at Taxiway A improvements is a mitigation pool (HELIX 2009) that is part of a larger restoration project undertaken at the Airport for previous project impacts. However, this pool was not used as mitigation as it was never signed off and the airport still has outstanding mitigation needs for that previous impact. City staff are working internally with other City departments and the Wildlife Agencies on offsite mitigation locations for the prior impacts. This pool totals 0.029 acre, of which 0.004 acre would be directly impacted, and the remaining 0.025 acre would be indirectly impacted. The entire pool area was considered permanently impacted herein. Impacts are considered potentially significant.

Impacts to the vernal pools and non-wetland waters may require issuance of a CWA Section 404 permit from the USACE, a CWA Section 401 Water Quality Certification or State Porter-Cologne Water Quality Control Act WDRs from the RWQCB, and/or a Streambed Alteration Agreement from CDFW. Only the USACE, RWQCB, and CDFW can make a final determination of jurisdictional boundaries.

5.2.4.4 Wildlife Movement

Would the proposed 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, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Wildlife corridors and linkages are linear spaces of undeveloped native habitat that connect both large and small natural open space and provide opportunities for wildlife movement on a local and regional scale. Wildlife corridors contribute to sustainability of populations by providing access to

larger areas of suitable habitat for dispersal, foraging, and mating. Linkages between wildlife corridors connect isolated blocks of habitat and allow movement or dispersal species over a large scale and the consequent mixing of genes between populations (i.e., gene pool diversity).

The AMP area contains areas mapped as MHPA under the City's SAP and VPHCP. A total of 197.8 acres of MHPA is mapped in the AMP area and includes lands in the northern, eastern, and western portions of the site (Figure 5.2-1). Although the MHPA within the AMP area does not act as a linkage due to its urban surroundings and lack of connectivity to other off-site resources, it does provide islands of habitat in a highly urbanized area. Large concentrations of vernal pools occur within the MHPA on site, as well as native habitat (such as Diegan coastal sage scrub) that is used by sensitive wildlife (e.g., coastal California gnatcatcher). Sensitive plant species also occur within the MHPA on site.

Land surrounding the airport is almost entirely developed. Within the City, large surface streets and extensive developments (i.e., residential and commercial) constrict and fragment upland habitats in many locations, including at and around MYF. Additionally, the entire AMP area is exposed to constant noise from airport activities and the surrounding existing developments in Kearny Mesa.

The aquatic, riparian, and upland habitats within the AMP area are not contiguous with any off-site sensitive habitats, as the site is surrounded by development on all sides. The AMP area does, however, contain critical habitat for San Diego fairy shrimp and spreading navarretia, due to the extensive concentration of vernal pools on site.

Although much of the land in the AMP area is or has been subject to repeated disturbance over many years and, with the exception of the eastern and northeastern areas, supports a predominance of non-native plant species, these lands continue to provide foraging and breeding habitat for several native species of wildlife. While the site does not function as a regional movement corridor due to its urban surroundings and isolation from other habitat areas, the identification of a transient least Bell's vireo on site in 2017 suggests that birds, who are less constrained by roads and development, can use the site as a stopover location during migration, as well as for foraging and nesting. Coyotes have also been observed on site.

However, as there are no regionally identified wildlife corridors or habitat linkages in the AMP area, and the project would not create any barriers to wildlife movement, no impact would occur to wildlife corridors or linkages.

5.2.4.5 Conservation Planning

Would the proposed project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Projects in the City are reviewed for compliance with the MSCP SAP and VPHCP guidelines and policies. Guidelines and policies applicable to the proposed project are described below. An assessment of the project's proposed MHPA BLA is also provided in this section.



Multiple Species Conservation Program Subarea Plan

The MSCP is a long-term regional conservation plan established to protect sensitive species and habitats within San Diego County. The MSCP is separated into local SAPs that are implemented independently from each other. Projects in the City are reviewed for conformance with the MSCP SAP guidelines and policies, including compatible land uses, general planning policies and design guidelines, LUAGs, general management directives, and area specific directives.

Compatible Land Uses – MSCP Subarea Plan Section 1.4.1

Land uses deemed compatible with the goal and objectives of the MSCP are allowed within the MHPA. Such uses include passive recreation, utility lines and roads, limited water facilities and other essential public facilities, limited low density housing, Brush Management Zone 2, and limited agriculture. Portions of the AMP area are located outside, adjacent to, and within the MHPA (Figure 5.2-1).

AMP project components within the MHPA include the installation of MALSR lighting in the southeastern portion of the site. MALSR lighting is an approach lighting system that assists aircraft with runway alignment during landing and is required for airport safety. The majority of the proposed MALSR lighting, as well as access to install the lighting, will occur along existing roads which are maintained as a covered airport activity under the VPHCP. However, due to FAA spacing requirements for the MALSR lighting, some lighting and associated access roads will require construction outside of the existing road network, resulting in new impacts within the MHPA. The installation of MALSR lighting and associated access roads are land uses that are compatible and consistent with Section 1.4.1 of the MSCP SAP.

Other project components proposed within the MHPA are adjacent to Taxiway A for the new hold bay. These are not compatible land uses within the MHPA. These improvements for the new hold bay at Taxiway A would be required to meet current FAA design standards. These improvements would result in 0.18 acre of temporary impacts and 0.33 acre of permanent impacts within the MHPA. These areas are immediately adjacent to existing Taxiway A. Disturbed habitat comprises most of this area, although non-native grassland, Diegan coastal sage scrub, and vernal pool also are present in the MHPA impact area (Table 5.2-2, *Proposed MHPA Impacts*).

**Table 5.2-2
PROPOSED MHPA IMPACTS**

Baseline Habitat	Tier	Impact (acres)¹
Vernal pool	Wetland	0.004
Diegan coastal sage scrub	II	0.01
Non-native grassland	IIIB	0.25
Disturbed habitat	IV	0.24
Developed	--	0.01
TOTAL		0.51²

1 Totals reflect rounding to the nearest thousandth acre for vernal pools and hundredth acre for other habitats.

2 Deletion area includes 0.33 acre of permanently impacted land, and 0.18 acre of temporarily impacted land.

In accordance with MM BIO-9, a BLA may be required to remove this small portion of the MHPA in the AMP development area that is proposed for development. As part of the BLA, an area of equivalent or higher biological value would be added adjacent to the current MHPA boundary. The MHPA on site currently exists primarily on the western, northern, and eastern portions of the AMP area (Figure 4). The central and southern portions of the AMP area are largely outside of the MHPA.

In order for a BLA to be approved, six findings must be made in accordance with Section 5.4.2 of the MSCP and Section 1.1.1 of the MSCP SAP (County 1998 and City 1997, respectively). These six findings include:

1. *Effects on significantly and sufficiently conserved habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly and sufficiently conserved habitats, as defined in Section 3.4.2 [of the MSCP Plan]).*
2. *Effects on covered species (i.e., the exchange maintains or increases the conservation of covered species).*
3. *Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves any habitat linkages or wildlife corridors).*
4. *Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection of biological resources).*
5. *Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve).*
6. *Effects on species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species would meet the criteria for listing under either the federal or state Endangered Species Acts).*

In addition, to complete a BLA the project proponent must have concurrence from the Wildlife Agencies.

Because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

Limited construction staging also is proposed within the northern portion of the MHPA, in association with existing roads and disturbed areas. Such staging is temporary and does not conflict with the MSCP SAP.

General Planning Policies and Design Guidelines – MSCP Subarea Plan Section 1.4.2

The MSCP SAP Planning Policies and Design Guidelines are established for the following actions: roads and utilities; fencing, lighting, and signage; materials storage; mining, extraction, and processing facilities; and flood control. Applicable guidelines are discussed below. The AMP does not include mining, extraction, or flood control activities; thus, no further discussion is provided for these topics.

Roads and Utilities – Construction and Maintenance Policies

- 1) *All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way and disturbed areas, minimizing habitat fragmentation.*

No utility lines are proposed within the MHPA; therefore, the AMP is consistent with this guideline.

- 2) *All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species, and wetlands. If avoidance is infeasible, mitigation will be required.*

Impacts within the MHPA are associated with runway safety improvements and FAA-required lighting systems. Impacts to biological resources have been minimized by aligning impacts within the existing road network to the extent feasible. Impacts to wetlands and the habitats of MSCP covered species could not be completely avoided due to FAA requirements for the location of these safety improvements. Impacts will be mitigated in accordance with the City's Biology Guidelines, MSCP SAP, and the VPHCP.

- 3) *Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.*

Temporary staging areas and access roads have been placed within developed areas to the extent feasible. New components of the MALSR lighting system will be accessible primarily through existing roads in the MHPA, with only minor areas of new permanent access road construction needed due to FAA-mandated spacing requirements for the MALSR. Road locations were selected based on impacting the smallest areas of sensitive habitat possible while still providing access according to FAA regulations. Temporary impacts within the MHPA will be restored following completion of construction.

- 4) *Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.*

The AMP does not include construction or maintenance efforts in wildlife corridors. There are no wildlife corridors within the AMP area, as discussed in Section 5.2.4.4.

- 5) *Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access*

roads. Local streets should not cross the MHPA except where needed to access isolated development areas.

The AMP includes the construction of necessary access/maintenance roads for FAA-required MALSR lighting system within the MHPA. These roads will not be open to the public.

- 6) *Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible of the MHPA in order to minimize impacts and fragmentation of sensitive species and habitat. If roads cross the MHPA, they should provide for fully-functional wildlife movement capability. Bridges are the preferred method of providing for movement, although culverts in selected locations may be acceptable. Fencing, grading, and plant cover should be provided where needed to protect and shield animals, and guide them away from roads to appropriate crossings.*

Canyons are not present on site and the AMP does not propose development of roads in a canyon bottom. Access roads constructed for the MALSR lighting system would be low use, at grade roads that would not interfere with wildlife movement capability.

- 7) *Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.*

See AMP consistency discussions for numbers 1 through 6 above. New roads within the MHPA are for maintenance access associated with the MALSR lighting system. They will be constructed to the minimum width needed for access.

- 8) *For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5.*

Existing access roads are a compatible use and maintenance of such roads are a covered airport activity in the VPHCP.

Overall, the AMP is consistent with the City's policies and guidelines for roads and utilities within or adjacent to the MHPA.

Fencing, Lighting, and Signage

- 1) *Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. For example, use chain link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain link to provide added protection of certain sensitive species or habitats (e.g., vernal pools).*

The airport has existing perimeter fencing to prevent public access from neighboring properties. This fencing, portions of which follow the outer edge of the MHPA, is managed and maintained by the City. Additional fencing is not needed as the airfield does not have public access.

- 2) *Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low sodium or similar lighting. Signage will be limited to access and litter control and educational purposes.*

Proposed lighting where adjacent to the MHPA would be limited, directed away from the MHPA, and shielded to protect the MHPA from artificial night lighting. MALSRL lighting proposed within the MHPA would be the minimum necessary to meet the requirements set forth by the FAA.

The AMP is consistent with the City's policies and guidelines for fencing, lighting, and signage for projects within or adjacent to the MHPA.

Materials Storage

- 1) *Prohibit storage of materials (e.g., hazardous or toxic, chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.*

The AMP does not include land uses within the MHPA that require storage of hazardous or toxic chemicals, materials, or substances. The AMP design was configured to locate future improvements outside of the MHPA to the extent feasible, and land uses adjacent to the MHPA were selected to be consistent with those prescribed in Section 1.4.1 of the SAP. Furthermore, AMP areas within and adjacent to the MHPA would comply with the City's MHPA LUAGs (discussed below). Thus, the AMP would comply with the City's policies and guidelines on material storage.

Land Use Adjacency Guidelines – MSCP Subarea Plan Section 1.4.3

The City's SAP requires projects in or adjacent to the MHPA to conform with LUAGs addressing drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading.

Because portions of the AMP area are located within or immediately adjacent to the MHPA, implementation and compliance with the LUAGs is required. Below provides an analysis of the project's consistency with each of the LUAGs. Note that conformance with the MHPA LUAGs (in italics below) is a standard requirement as part of conditions of approval in the City and required to be included as "Environmental Requirements" on future construction plans.

Drainage: *All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.*

Impervious surfaces and developed areas associated with implementation of the AMP would be designed to avoid drainage into the MHPA. Chemicals (i.e., fuel, oil, etc.) required for the operation of the airport will be handled in a manner that is safe as required by the USEPA. Chemicals, toxins, and petroleum will be prevented from entering the MHPA, and specific measures will be identified during project design for future projects implemented under the AMP. Such measures would conform to applicable city, state, and federal regulations addressing storm water runoff during and after construction.

Toxics: *Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.*

The AMP does not include agricultural uses. The only recreation use proposed as part of the AMP is the public viewing area in the northwest corner of the site. This platform would not generate chemicals or other by-products that could be harmful to wildlife, habitat, or water quality.

As stated above, developed areas associated with the AMP would be designed to not drain directly into the MHPA, and would conform to regulations governing runoff.

Lighting: *Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA.*

Proposed lighting, where adjacent to the MHPA, would be limited, directed away from the MHPA, and shielded to protect the MHPA from artificial night lighting. MALS lighting proposed within the MHPA would be the minimum necessary to meet the requirements set forth by the FAA.

Noise: *Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA.*

As described further in Section 5.9, *Noise*, uses proposed under the project would either not generate noise (e.g., the reconfigured taxiways) or would not create substantial new sources of noise in the project area, as similar uses already exist. In addition, various features such as land use placement, constructed topography, walls, and berms would be applied into the project design, where necessary, to ensure that noise from the AMP would not interfere with the MHPA.

Construction-generated noise from future projects implemented as part of the AMP could cause a significant impact on coastal California gnatcatcher in the MHPA during the breeding season. To comply with the City's LUAGs and avoid potential indirect impacts to coastal California gnatcatcher in the MHPA, construction within the MHPA would be implemented outside of the breeding season for this species, which is defined by the City as March 1 to August 15.

If construction activities within the MHPA are unable to avoid the breeding season for California gnatcatcher, USFWS protocol surveys would be conducted in suitable habitat prior to the construction implementation to determine species presence/absence. If protocol surveys are not conducted, presence of the species would be assumed, and the implementation of noise attenuation and biological monitoring would be required during the gnatcatcher breeding season if construction would generate noise levels higher than 60 dBA or ambient (whichever is higher).

Barriers: *New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.*

Future improvements/projects associated with the AMP are located almost entirely outside of the MHPA. However, some future development areas are near or adjacent to the MHPA. The public viewing platform in the northwest corner of the site is adjacent to the MHPA. This platform will be

fenced to preclude public access into the MHPA. Other barriers are not needed, as the airport property is fenced and access to the airfield is restricted and controlled, with no public access to the MHPA.

Invasives: *No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.*

Any landscaping or revegetation activities within or adjacent to the MHPA would not include invasive species. The LUAG cites the American Society of Landscape Architects Invasive Plant Guide (ASLA) as a reference for plant species considered invasive. This guide is a living document that is periodically updated by the San Diego Chapter of the ASLA. Plant species listed in the California Invasive Plant Council (Cal-IPC) inventory (Cal-IPC 2019) are also considered invasive. Any landscape, mitigation, and/or revegetation plans for the AMP shall not include species listed as invasive by ASLA or Cal-IPC.

Furthermore, the project would conform to the City's Landscape Guidelines prohibiting the planting of invasive species, as well as conforming to standard BMPs during construction to help avoid the introduction of invasive plants into the AMP area and dispersal of invasive plants from the AMP area by equipment.

Brush Management: *New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA.*

The AMP is not a residential development, nor does it propose brush management adjacent to the MHPA.

Grading/Land Development: *Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.*

The AMP does not propose construction of manufactured slopes.

General Management Directives – MSCP Subarea Plan Section 1.5.2

The AMP has considered the general MSCP management directives (MSCP SAP Section 1.5.2) in the overall design, and as such, has incorporated components as applicable. Applicable directives are discussed below.

- *Mitigation*

Proposed biological mitigation for the AMP will be conducted in accordance with the City ESL and Biology Guidelines.

- *Restoration*

All temporarily impacted areas will be restored to pre-project conditions, or a level of higher biological value, following completion of construction.

- *Public Access, Trails, and Recreation*

The AMP would include a designated viewing area outside of the MHPA where members of the public could view airport operations and aircraft. This area would be in the northwest corner of the site, outside of a secure fence line. Planning details of this platform are being developed in coordination with the Kearny Mesa Community Plan Update effort. The AMP does not include public access or trails.

- *Litter/Trash and Materials Storage*

The AMP would not produce litter, trash, or store hazardous materials in the MHPA. The AMP was designed to incorporate and adhere to the City LUAGs.

- *Adjacency Management Issues*

Although some related issues are addressed above, overall, the AMP would address MHPA adjacency issues through implementation of the LUAGs.

- *Invasive Exotics Control and Removal*

Introduction of non-native species into the MHPA is not expected to occur from implementation of future projects under the AMP. As discussed above, no invasive plants would be installed as part of the AMP, and invasive species observed would be targeted for removal from any mitigation area associated with implementation of the AMP. Lastly, the MHPA located on site is monitored and managed by the City, and as such it is expected that management of invasive exotic species control and removal would be implemented by the City as part of standard MSCP monitoring and maintenance activities. As discussed above, the AMP is consistent with the general management directives of the MSCP SAP.

Area Specific Management Directives

There are no Area Specific Management Directives for Urban Habitat Lands (MSCP SAP Section 1.5.7), where MYF is located. Therefore, the AMP would not conflict with this SAP section.

Vernal Pool Habitat Conservation Plan

Section 4.2.7 of the VPHCP (City 2019) includes discussion of MYF. Federal aviation regulations require the airport be maintained and operated in a manner that promotes the health, safety, and welfare of airport users, and the surrounding community. The following are covered airport activities in the VPHCP: maintenance and inspections of all existing safety areas, runway protection zones, critical areas, infields, runway and taxi shoulders, and storm water conveyances; maintenance, access, inspections, and operation of all existing equipment and infrastructure for public safety and normal airport operations; CIP rehabilitation and/or maintenance of existing airport infrastructure; and maintenance and inspection of exiting public right of way access.

The AMP proposes construction of MALSRL lighting within the MHPA and access to some of the lighting would be via existing roads. Use and maintenance of these existing roads is a covered airport activity. However, installation of MALSRL lighting also would require construction of short reaches of new access road within the MHPA; these new access roads are not a covered activity under the VPHCP but are a compatible land use within the MHPA (as discussed above). Impacts associated with the MALSRL lighting and new access roads are discussed in more detail in the following sections.

Avoidance and Minimization Measures

Section 5.2.1 of the VPHCP identifies avoidance and minimization measures to address potential indirect impacts to vernal pools preserved under the VPHCP. Specific avoidance and minimization measures in Section 5.2.1 of the VPHCP and the project's compliance are summarized below:

- Development adjacent to the MHPA shall slope away from avoided pools.

Project compliance: All grading will be designed to slope away from avoided pools to the extent feasible. If grading cannot slope away from pools (e.g., in the MHPA BLA deletion area) BMPs and/or other design features will be used to minimize impacts to vernal pools.

- Temporary fencing with silt fencing shall be required.

Project compliance: Construction limits would be demarcated with construction and silt fencing.

- Impacts from fugitive dust would be avoided and minimized through watering and other appropriate measures.

Project compliance: Routine dust control via watering truck would be implemented throughout ground disturbing activities.

- A qualified biologist shall be on site during construction activities to help ensure compliance with all mitigation requirements.

Project compliance: Biological monitoring by a qualified biologist would be implemented throughout project construction.

- Employees shall limit activities to the fenced project footprint, and the site shall be kept free of debris and food-related trash items.

Project compliance: A qualified biologist would be on site to monitor construction, including verification that construction activities do not exceed the authorized work limits and that good housekeeping is adhered to during construction.

- Equipment maintenance, staging, and disposal of fuel, oil coolant shall occur outside of wetlands, and within designated areas in the fenced project impact limits only.

Project compliance: Designated equipment staging/maintenance/fueling/ etc. shall be demarcated on the final construction plans. Additionally, a qualified biologist would monitor project compliance regarding equipment.

- Permanent fencing along the interface with development areas and/or other use other measures approved by the City will be installed to deter human and pet access.

Project compliance: The airport is fenced, and the airfield is not accessible to the public. Vernal pools in the airport are not currently fenced, however, projects implemented under the AMP will incorporate temporary and/or permanent fencing, or other means of demarcation, as necessary, where permissible by FAA safety regulations, to help protect vernal pools within and adjacent to the work area during construction.

- Topsoil shall be salvaged from impacted pools supporting listed fairy shrimp and be consistent with approved restoration plan requirements.

Project compliance: Future projects under the AMP that impact vernal pools occupied by San Diego fairy shrimp will prepare a restoration plan consistent with VPHCP requirements and will include salvage of soil from occupied pools to be impacted.

In summary, future projects implemented under the AMP would implement the avoidance and minimization measures identified in Section 5.2.1 of the City's VPHCP.

Impacts To Vernal Pool Habitat Conservation Plan-Covered Species

Section 6.2.2 the VPHCP states two vernal pools occupied by San Diego mesa mint would not be conserved in the MHPA and could be lost due to FAA regulations for RSAs. Mitigation is required for any direct impacts to San Diego mesa mint and must include the salvage of seed or plants to preserve the population genetics. The AMP would impact a single pool supporting San Diego mesa mint and mitigation for this impact would include salvage of seed and/or plants and be consistent with the Mitigation Framework described in Section 5.3 of the VPHCP.

Regarding the take of San Diego fairy shrimp at the MYF airport, the VPHCP describes a total of 21 of 24 occupied pools that may potentially be directly impacted. Mitigation is required for any direct impacts to San Diego fairy shrimp. Where appropriate, the salvage of shrimp cysts may be required to minimize impacts and conserve the potentially unique genetics of impacted populations. The AMP would impact eight pools containing San Diego fairy shrimp and would mitigate in accordance with the Mitigation Framework described in Section 5.3 of the VPHCP.

A total of 48.3 acres of spreading navarretia critical habitat is present within the AMP area. No impacts would occur to spreading navarretia critical habitat from implementation of future projects under the AMP. The only AMP project features that may potentially occur in critical habitat for this species consist of 0.9 acre of temporary staging areas that overlap existing roads and other disturbed lands; no impact to critical habitat containing suitable habitat for the species would occur.

A total of 95.6 acres of San Diego fairy shrimp critical habitat is present within the AMP area. A total of 0.25 acre of permanent impacts would occur within critical habitat for this species, in lands adjacent to Taxiway A. This location, which supports Diegan coastal sage scrub, does not contain vernal pools or other habitats considered suitable for San Diego fairy shrimp. Temporary staging totaling 0.4 acre also may occur within existing roads and other disturbed lands in the limits of critical habitat for this species, which would not result in impacts to suitable habitat. No impact to critical habitat containing suitable habitat for the species would occur.

Minor Amendments

Section 8.4.3 of the VPHCP outlines a process for MYF to impact vernal pools and VPHCP-covered species on the airport property. Minor amendments allow impacts to vernal pool habitats and/or species within the boundary of the airport property. Impacts to vernal pool habitat and VPHCP covered species may be approved when it is necessary to meet the health and safety requirements of the airport. A minor amendment would be prepared, if required, prior to individual AMP improvement implementation.

Changes such as BLAs or other airport actions may be considered for a minor amendment. A minor amendment is granted by the Wildlife Agencies (USFWS Field Office Supervisor and CDFW's Natural Community Conservation Planning Program Manager) after a consistency determination with the VPHCP. If the minor amendment is approved, the Wildlife Agencies will provide a Letter of Concurrence. If the minor amendment is not approved and the project is determined to be not in conformance, the project would not be able to rely on the take coverage provided by the VPHCP.

5.2.5 Significance of Impacts

5.2.5.1 Sensitive Species

Sensitive Plant Species

Implementation of the AMP has the potential to affect San Diego mesa mint, graceful tarplant, and Nuttall's scrub oak, and potential impacts to Orcutt's brodiaea and San Diego goldenstar. Potential impacts to San Diego mesa mint would be considered significant. Potential impacts to graceful tarplant, Nuttall's scrub oak, Orcutt's brodiaea, and San Diego goldenstar would be considered less than significant.

Sensitive Wildlife Species

Implementation of the AMP would affect habitats occupied or suitable for San Diego fairy shrimp, coastal California gnatcatcher, BUOW, orange-throated whiptail, coast horned lizard, Coronado skink, western spadefoot toad, Cooper's hawk, sharp-shinned hawk, southern California rufous-crowned sparrow, northern harrier, white-tailed kite, horned lark, loggerhead shrike, San Diego desert woodrat, and Crotch's bumble bee. Potential direct and/or indirect impacts to San Diego fairy shrimp, coastal California gnatcatcher, BUOW, Crotch's bumble bee, and nesting birds would be considered significant. Potential impacts to southern California rufous-crowned sparrow, northern harrier, Cooper's hawk, coast horned lizard, orange-throated whiptail, Coronado skink, loggerhead shrike, horned lark, white-tailed kite, sharp-shinned hawk, San Diego desert woodrat, and western spadefoot would be considered less than significant.

5.2.5.2 Sensitive Habitats

Implementation of the AMP would result in direct impacts to 25.7 acres of sensitive vegetation communities, composed of 0.54 acre of vernal pool, 0.5 acre of sage scrub, less than 0.1 acre of baccharis scrub, less than 0.1 acre of chamise chaparral, and 24.7 acres of non-native grassland. These impacts would be considered significant. Significant impacts also could occur if the project

were to impact lands outside of the approved impact footprint, either directly through habitat removal, or indirectly through runoff, sedimentation, fugitive dust, or other edge effects.

5.2.5.3 Wetlands

Implementation of the AMP would impact 0.54 acre of vernal pools; such impacts are considered significant.

5.2.5.4 Wildlife Movement

There are no regionally identified wildlife corridors or habitat linkages on the AMP area, and the project would not create any barriers to wildlife movement. No impact would occur to wildlife corridors or linkages.

5.2.5.5 Conservation Planning

The AMP would involve the development of incompatible uses with the MHPA, and would therefore conflict with the VPHCP and MSCP SAP. Impacts are considered significant.

5.2.6 Mitigation Framework

The following mitigation measures shall be implemented to reduce potential impacts from implementation of the AMP.

5.2.6.1 Sensitive Species

MM BIO-1 Project-specific Biological Resource Surveys. Prior to the construction of any improvement project sited within or adjacent to an undeveloped open space area (i.e., an area supporting naturalized habitat, sensitive habitat, and/or habitat potentially suitable for special-status species), the City shall retain a qualified biologist to perform a reconnaissance survey to verify existing biological resources on and adjacent to the project construction areas. The City shall provide the biologist with a copy of project plans that clearly depict the construction work limits, including construction staging, storage, and access areas, to determine which specific portion(s) of the project will require inspection of adjacent open space areas. The survey shall verify whether the planned construction activities would occur on or in the immediate vicinity of habitat suitable for special-status species. The surveys shall also verify whether the construction activities may result in direct or indirect impacts to special-status species. The survey results shall be submitted to the City to determine the need to implement additional mitigation measures to avoid, minimize, and mitigate impacts to such resources, as applicable. If suitable habitat for special-status plant species is confirmed within or immediately adjacent to potential impact areas of the project, then the City shall retain a qualified biologist to conduct focused presence/absence surveys for rare plants prior to project construction. Surveys shall follow protocols and guidelines approved by the USFWS, CDFW, and/or CNPS and shall be conducted by qualified biologists. Mitigation for impacts to sensitive plant species with CNPS California Rare Plant Rank 1A, 1B, 2A, or 2B shall be determined

by the City in consultation with the CDFW and/or USFWS, as applicable. If suitable habitat for special-status wildlife species is confirmed within or adjacent to potential impact areas of the project, then the City shall retain a qualified biologist to conduct focused, protocol-level surveys for special-status wildlife species prior to commencement of construction activities. Surveys shall follow protocols and guidelines approved by the USFWS and/or CDFW and shall be conducted by qualified biologists permitted by the USFWS and the CDFW, as applicable. Mitigation for impacts to sensitive wildlife species shall be determined by the City in consultation with the CDFW and/or USFWS, as applicable.

MM BIO-2 San Diego Mesa Mint

- A. Prior to impacting habitat supporting San Diego mesa mint, collection of seed and/or salvage of plants will occur for future installation into pools at the mitigation site for project impacts.
- B. A Vernal Pool Mitigation Plan consistent with the requirements outlined in VPHCP Section 5.3 Mitigation Framework must be prepared and incorporate all applicable conditions for vernal pool and covered species mitigation.

MM BIO-3 San Diego Fairy Shrimp

- A. Prior to impacting habitat supporting San Diego fairy shrimp, soil shall be salvaged from appropriate pools (i.e., high quality and no presence of versatile fairy shrimp [*Branchinecta lindahl*]) for installation in pools at the project's mitigation site.
- B. A Vernal Pool Mitigation Plan consistent with the requirements outlined in VPHCP Section 5.3 Mitigation Framework must be prepared and incorporate all applicable conditions for vernal pool and covered species mitigation.
- C. Regulatory permits, as applicable, must be obtained from the appropriate wetland regulatory agencies prior to impacting jurisdictional vernal pools.
- D. Impacts to vernal pools occupied by San Diego fairy shrimp will be mitigated in-kind at ratios identified in BIO-8.

MM BIO-4 Coastal California Gnatcatcher

- A. Impacts to Diegan coastal sage scrub occupied by coastal California gnatcatcher will be mitigated in-kind at ratios identified in BIO-8.
- B. No clearing, grubbing, grading of habitat shall occur between March 1 through August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the City Manager:

A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels (dBA)

hourly average, or exceeding ambient noise levels if greater than 60 dBA, for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:

- I. Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
- II. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average or ambient, whichever is higher, at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average or ambient (whichever is higher) at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or
- III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA hourly average or ambient (whichever is higher) at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA or ambient (whichever is higher) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

**Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.*

If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the City Manager and applicable Resource Agencies that demonstrates whether or not mitigation measures, such as noise walls, are necessary between March 1 and August 15 as follows:

- IV. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then Condition III shall be adhered to as specified above.
- V. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

MM BIO-5 Burrowing Owl Pre-Construction Survey

Direct impacts to burrowing owl (BUOW) are not anticipated as this species is not known to occupy the site and the single documented occurrence of this species during the breeding season was in 2007. Other observations of this species have occurred during the wintering season. However, since suitable habitat is present and the species has potential to occupy the site in the future, the following mitigation measures will be implemented to meet the MSCP Subarea Plan Conditions of Coverage for potential impacts to BUOW and associated habitat located outside of the MHPA:

A. Prior to Permit or Notice to Proceed Issuance:

1. As this project has been determined to be BUOW occupied or to have BUOW occupation potential, the Applicant Department or Permit Holder shall submit evidence to the Assistant Deputy Director (ADD) of Entitlements verifying that a Biologist possessing qualifications pursuant to the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation ("Staff Report"; CDFW 2012) has been retained to implement a BUOW construction impact avoidance program. All biologists surveying for and/or monitoring BUOW shall obtain a Scientific Collecting Permit issued by CDFW. Additionally, any proposed burrow or surrogate burrow closure, handling of owls for health assessments, banding, passive relocations, eviction, and/or active relocation shall obtain a CESA Memorandum of Understanding¹ from CDFW.
2. The qualified BUOW Biologist (or their designated biological representative) shall attend the pre construction meeting to inform construction personnel about the City's BUOW requirements and subsequent survey schedule.

¹ <https://wildlife.ca.gov/Conservation/CESA/Permitting#550391512-memorandum-of-understanding-mou--2081-a>

B. Prior to Start of Construction:

1. The Applicant Department or Permit Holder and Qualified BUOW Biologist must ensure that initial pre-construction/take avoidance surveys of the project "site" are completed within 14 days before initial construction activities, including brushing, clearing, grubbing, or grading of the Project site, regardless of the time of the year. An additional verification survey will be conducted within 24 hours of ground disturbing activities. The additional verification survey will be a focused protocol-level survey following methods described in CDFW's 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012). "Site" means the project site and the area within a radius of 450 feet of the project site. The report shall be submitted and approved by the Wildlife Agencies and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the project site and BUOW locations on aerial photos. If BUOW is detected during preconstruction surveys, setback buffer distances shall be established consistent with Table 1 of CDFW's 2012 Staff Report. Any reduction and/or modifications to the setback buffer distance shall be approved by CDFW prior to implementation.
2. The pre-construction survey shall follow the methods described in Appendix D of the CDFW 2012 Staff Report on Burrowing Owl Mitigation.
3. Twenty-four hours prior to commencement of ground disturbing activities, the Qualified BUOW Biologist shall verify results of pre-construction/take avoidance surveys. Verification shall be provided to the City's Mitigation Monitoring and Coordination (MMC) Section. If results of the pre construction surveys have changed, and BUOW are present in areas not previously identified, immediate notification to the City and Wildlife Agencies shall be provided prior to ground disturbing activities.

C. During Construction:

1. **Best Management Practices Shall Be Employed** - BUOWs are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects which are BUOW- occupied and have followed all protocols in this mitigation section, or sites within 450 feet of occupied BUOW areas, should undertake measures to discourage BUOWs from recolonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms.
2. **Ongoing BUOW Detection** -If BUOWs or active burrows are not detected during the preconstruction surveys, Section "a" below shall be followed. If BUOWs or burrows are detected during the pre-construction surveys, Section "b" shall be followed. Neither the MSCP Subarea Plan nor this

mitigation section allow for any BUOWs to be injured or killed outside or within the MHPAs; in addition, impacts to BUOWs within the MHPA must be avoided.

- a. **Post Survey Follow Up if Burrowing Owls and/or Signs of Active Natural or Artificial Burrows Are Not Detected During the Initial Pre- Construction Survey** - Monitoring the site for new burrows is required using the 2012 Staff Report Appendix D methods for the period following the initial pre construction survey, until construction is scheduled to be complete, and is complete. *(NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule which adheres to the required number of surveys in the detection protocol.)*
 - i. If no active burrows are found but BUOWs are observed to occasionally use the site for roosting or foraging (one to three sightings), they should be allowed to do so with no changes in the construction or construction schedule.
 - ii. If no active burrows are found but BUOWs are observed during follow up monitoring to repeatedly use the site for roosting or foraging (four or more sightings), the City's MMC Section shall be notified and any portion of the site where owls have been sighted and that has not been graded or otherwise disturbed shall be avoided until further notice.
 - iii. If a BUOW begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section b, below, must be followed.
 - iv. Any actions other than these require the approval of the City and the Wildlife Agencies.
- b. **Post-Survey Follow Up if Burrowing Owls and/or Active Natural or Artificial Burrows are detected during the Initial Pre-Construction Survey** - Monitoring the site for new burrows is required using 2012 Staff Report Appendix D for the period following the initial pre-construction survey, until construction is scheduled to be complete, and is complete. *(NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule which adheres to the required number of surveys in the detection protocol.)*
 - i. This section (b) applies only to sites (including biologically defined territory) wholly outside of the MHPA - **all direct**

and indirect impacts to BUOWs within the MHPA SHALL be avoided.

- ii. If one or more BUOWs are using any burrows (including pipes, culverts, debris piles, etc.) on or within 300 feet of the proposed construction area, the City's MMC Section shall be contacted. The City's MMC Section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist an appropriate City biologist for on-going coordination with the Wildlife Agencies and the Qualified BUOW Biologist. No construction shall occur within 300 feet of an active burrow without written concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography and other physical and biological characteristics.
 - 1) **Outside the Breeding Season** - If the BUOW is using a burrow on site outside the breeding season (i.e., September 1 - January 31), the BUOW may be evicted after the Qualified BUOW Biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow and written concurrence from the Wildlife Agencies for eviction is obtained prior to implementation.
 - 2) **During Breeding Season** - If a BUOW is using a burrow on site during the breeding season (February 1-August 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the BUOWs can be evicted. Eviction requires written concurrence from the Wildlife Agencies prior to implementation.
3. **Survey Reporting During Construction** - Details of construction surveys and evictions (if applicable) carried out shall be reported immediately (within five working days or sooner) to the City's MMC Section and the Wildlife Agencies and must be provided in writing (as by email) and acknowledged to have been received by the required Agencies and Development Services Department Staff member(s).

D. Post-Construction:

1. Details of the all surveys and actions undertaken on site with respect to BUOW (i.e., occupation, eviction, locations, etc.) shall be reported to the City's MMC Section and the Wildlife Agencies within 21 days post-construction and prior to the release of any grading bonds. This report must include summaries of all previous reports for the site.

MM BIO-6 Burrowing Owl Occupied Habitat

- A. Impacts to non-native grassland occupied by BUOW will be mitigated in-kind at ratios identified in BIO-8 and such mitigation lands must be through the conservation of occupied BUOW habitat or conservation of lands appropriate for restoration, management, and enhancement of BUOW nesting and foraging requirements. Such lands will either be within the MHPA, contiguous with MHPA lands or other preserve lands, or in another location with long-term viability that is acceptable to the City, CDFW, and USFWS. The search for potential mitigation land will focus first on lands within Otay Mesa. If mitigation land cannot be located within Otay Mesa, suitable lands within the City's MSCP SAP boundary will be considered. Temporary impacts to habitat occupied by BUOW shall also be mitigated for in conformance with the MSCP Conditions of Coverage for BUOW.
- B. A Burrowing Owl Mitigation Plan shall be prepared and approved by the City, CDFW, and USFWS prior to issuance of any construction permits associated with the AMP.

MM BIO-7 Crotch's Bumble Bee

A qualified biologist will conduct a habitat assessment to determine if potentially suitable habitat for Crotch's bumble bee is present within the project footprint. If potentially suitable habitat is present, the following measures shall be implemented to reduce potential impacts to this species:

- A. Focused Survey:** Before the commencement of construction activities (i.e., demolition, earthwork, clearing, and grubbing), Crotch's bumble bee focused surveys shall be conducted. A qualified biologist familiar with Crotch's bumble bee identification and life history shall conduct three visual surveys at least seven days apart during the colony active period (March 1 through September 1 [CDFW 2023]). Surveys shall be conducted in accordance with the Survey Considerations document for CESA Candidate Bumble Bees published by CDFW. If focused surveys are negative, no further assessment shall be required, and construction activities shall be allowed to proceed without any further requirements.

If Crotch's bumble bee is detected during focused surveys, Measures B and C below shall be implemented.

- B. CESA Compliance:** Prior to start of project construction, required consultation with CDFW regarding the project's effects on Crotch's bumble bee must occur. If Crotch's bumble bee is present, a qualified biologist shall identify the location of all nests in or adjacent to the Project site. If nests are identified, 50-foot no-disturbance buffer zones shall be established around nests to reduce the risk of disturbance or accidental take. If take of Crotch's bumble bee is expected, an incidental take permit issued by the CDFW must be obtained, as applicable. Early consultation is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. In addition, if an

incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any inconsistent measures provided in the AMP EIR. CESA compliance shall only be required if Crotch's bumble bee remains as a candidate state endangered species or is listed as a state endangered species at the time of project construction. If Crotch's bumble bee is delisted, this measure shall not be required.

- C. Compensatory Mitigation:** Impacts to habitat occupied by Crotch's bumble bee will be mitigated at ratios identified in BIO-8. If an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any measures and mitigation ratios provided in the AMP EIR.

5.2.6.2 Sensitive Habitats

MM BIO-8 Sensitive Habitat Mitigation Ratios

- A. Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.
- B. Impacts to 0.54 acre of vernal pool shall be mitigated in accordance with ratios provided in Table 2A of the City's Biology Guidelines. Mitigation is anticipated to occur at 2:1 for impacts to vernal pools not occupied by listed plant species or occupied only by San Diego fairy shrimp and no listed plant species, and 4:1 for impacts to vernal pool occupied by San Diego mesa mint, for a total anticipated vernal pool mitigation obligation of 1.138 acre. Vernal pool mitigation shall be accomplished in-kind and shall incorporate a minimum of 1:1 acre of vernal pool creation/establishment to achieve no net loss of wetland function and values. Prior to impacts, a Vernal Pool Mitigation Plan consistent with VPHCP Section 5.3 Mitigation Framework shall be prepared and incorporate all applicable conditions for vernal pool mitigation. Mitigation for impacts to a vernal pool that has already been used for mitigation would require ratios of 4:1 (pools not occupied by listed species) and 8:1 (pool occupied by listed species) respectively. Concurrence from the FAA is required for any mitigation within the airport boundary.
- C. Impacts to a combined total of 0.6 acre of Diegan coastal sage scrub and baccharis scrub (Tier II) habitats shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for an anticipated combined mitigation obligation of 0.6 acre.
- D. Impacts to 0.1 acre of chamise chaparral (Tier IIIA) habitat shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for an anticipated mitigation obligation of 0.05 acre.

- E. Impacts to 24.7 acres of non-native grassland (Tier IIIB) habitat shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for an anticipated mitigation obligation of 12.4 acres.

Table 5.2-3
MITIGATION FOR SIGNIFICANT IMPACTS TO SENSITIVE HABITATS (acres)¹

Habitat	Tier	Impact ²			Mitigation Ratio ³	Required Mitigation
		Inside MHPA	Outside MHPA	TOTAL		
Wetland Habitat						
Vernal pool without listed plant species ⁴	Wetland	0.221	0.290	0.511	2:1 ⁴	1.022
Vernal pool with San Diego mesa mint ⁵	Wetland	0.029	--	0.029	4:1 ⁴	0.116
Wetland Subtotal		0.250	0.290	0.54	--	1.138
Sensitive Upland Habitat						
Diegan coastal sage scrub-including disturbed phase	II	0.4	0.1	0.5	1:1	0.5
Baccharis scrub – including disturbed phase	II	0.1	--	0.1	1:1	0.1
Tier II Subtotal		0.5	0.1	0.6	--	0.6
Chamise chaparral	IIIA	0.1	--	0.1	0.5:1	0.05
Non-native grassland	IIIB	0.4	24.3	24.7	1:1/0.5:1 ⁶	12.35
Tier III Subtotal		0.5	24.3	24.8	--	12.4
Sensitive Upland Subtotal		0.1	24.4	25.4	--	13.0
TOTAL		0.35	24.69	25.94	--	14.138

¹ All data is in acres rounded to the nearest tenth (0.1) for uplands and thousandth (0.001) for wetlands. "--" equals no impact under the impact column, or not applicable where under the mitigation ratio column.

² Temporary and permanent impacts combined.

³ Mitigation ratios per City Biology Guidelines and all mitigation is inside the MHPA.

⁴ Per the City Biology Guidelines (2018), mitigation for vernal pool impacts consistent with the VPHCP range from 2:1 to 4:1, and shall be 2:1 for listed fairy shrimp or pools without listed plant species and 4:1 for listed plant species with very limited distributions, e.g., San Diego mesa mint.

⁵ This pool is also part of a mitigation effort associated with previous impacts on MYF. However, the mitigation has not been accepted, therefore higher ratios do not apply.

⁶ Mitigation for non-native grassland is 1:1 for impacts occurring within the MHPA and 0.5:1 for impacts occurring outside the MHPA.

- F. **Vernal Pool Surveys.** Updated surveys to map vernal pools will be conducted prior to implementation of AMP projects which would affect non-developed lands (i.e., non-native grassland or disturbed habitat). If new pools are identified that would be affected by an AMP project, such impacts shall conform with the applicable avoidance and minimization measures and the mitigation framework described in the VPHCP.

5.2.6.3 Wetlands

MM BIO-8 (Sensitive Habitat Mitigation Ratios), see above.

5.2.6.4 Conservation Planning

MM BIO-9 MHPA Avoidance and/or Restoration. All development within the MHPA shall be designed to minimize environmental impacts and must avoid disturbing the habitat of MSCP-covered species and wetlands. If such avoidance is unfeasible, impacts shall be mitigated. Temporary access roads and staging areas in the MHPA shall be located in existing disturbed areas rather than in habitat. If temporary disturbance to habitat in the MHPA is unavoidable, restoration of and/or mitigation for the disturbed area shall be required in accordance with the ratios specified in MM BIO-8. If a proposed project would encroach into the MHPA beyond the allowable development area pursuant to Sections 143.0142 and 131.0250(b) of the City of San Diego Land Development Code, Biology Guidelines, a MHPA boundary line adjustment shall be required. Under the City's MSCP Subarea Plan, an adjustment to the City's MHPA boundary is allowed only if the new MHPA boundary results in an exchange of lands that are functionally equivalent or higher in biological value. A determination of functionally equivalent or higher biological value shall be based on site-specific information (both quantitative and qualitative) that addresses the six boundary adjustment criteria outlined in Section 5.4.3 of the Final MSCP Plan (August 1998), which are as follows:

1. Effects on significantly and sufficiently conserved habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly and sufficiently conserved habitats, as defined in Section 3.4.2 [of the Final MSCP Plan]).
2. Effects on covered species (i.e., the exchange maintains or increases the conservation of covered species).
3. Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves any habitat linkages or wildlife corridors).
4. Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection of biological resources).
5. Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve).
6. Effects on species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species will meet the criteria for listing under either the federal or state ESAs).

All proposed MHPA boundary adjustments require approval from the Wildlife Agencies. Approval is required prior to the release of the environmental documentation for the project. Early consultation with the Wildlife Agencies shall be required for any proposed MHPA boundary adjustment. Any proposed boundary

adjustment shall also be disclosed in the environmental document (i.e., CEQA) for the project.

5.2.6.5 Biological Resource Protection During Construction

The following biological resource protection measures will be implemented during construction to help ensure avoidance of indirect impacts to sensitive habitat and species and such measures will be shown on the construction plans.

MM BIO-10 Construction Plan Requirements

Prior to the issuance of any grading permit, the City Manager (or appointed designee) shall verify that the following project requirements are shown on the construction plans:

- I. Prior to Construction
 - A. Biologist Verification – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
 - B. Pre-construction Meeting – The Qualified Biologist shall attend the pre-construction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
 - C. Biological Documents – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts (ESAs); and/or other local, state, or federal requirements.
 - D. BCME – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, BUOW exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The

BCME shall be approved by MMC and referenced in the construction documents.

- E. Avian Protection Requirements – To avoid direct impacts to avian species identified as a listed, candidate, sensitive, or special status species (BUOW, coastal cactus wren, northern harrier, white-tailed kite, horned lark, grasshopper sparrow, loggerhead shrike, coastal California gnatcatcher, southern California rufous-crowned sparrow, and yellow warbler), no clearing, grubbing, or grading shall occur during the general avian breeding season (February 1 to September 15) without a pre-construction nesting bird survey. If grubbing, clearing, or grading would occur during the general avian breeding season, a qualified biologist shall survey the project area no more than three days prior to the commencement of the activities to determine if active bird nests belonging to listed, candidate, sensitive, or special status species are present in the affected areas. If the qualified biologist determines that no active nests occur, the activities shall be allowed to proceed. If the qualified biologist determines that an active nest is present, appropriate setbacks shall be implemented as determined by the biologist. CDFW generally recommends a 100-foot buffer for common avian species, 300 feet for listed and sensitive species, and 500 feet for raptors, with reductions in nest buffers allowable depending on the avian species involved, ambient levels of human activity, screening vegetation, and other relevant factors. The buffer shall be delineated by temporary fencing and remain in effect for the duration of all construction activities, or until such time as No impacts shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, as determined by the qualified biologist. The results of the pre-construction nesting bird survey shall be reported to the City in a brief memorandum.
- F. BUOW Protection Requirement – No clearing, grubbing, grading, or other construction activities shall occur in occupied burrowing habitat between February 1 and August 31, the breeding season of the BUOW.
- G. Resource Delineation – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the project site.
- H. Education – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site area educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers,

flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. Monitoring – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on “Exhibit A” and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. Subsequent Resource Identification – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL, MSCP, VPHCP, State CEQA, and other applicable local, state, and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

5.2.7 Significance of Impacts after Mitigation

5.2.7.1 Sensitive Species

Implementation of MM BIO-1 through MM BIO-8 and MM BIO-10 would reduce potential impacts to sensitive species to below a level of significance.

5.2.7.2 Sensitive Habitats

Implementation of MM BIO-8 and MM BIO-10 would reduce potential impacts to sensitive habitats to below a level of significance.

5.2.7.3 Wetlands

Implementation of MM BIO-8 and MM BIO-10 would reduce potential impacts to wetlands to below a level of significance.

5.2.7.4 Conservation Planning

As discussed further above, because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies in accordance with MM BIO-9, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

5.3 Geology and Soils

This section of the PEIR addresses potential impacts related to geological conditions that could result from implementation of the project.

5.3.1 Existing Conditions

The existing environmental setting, which includes a detailed description of existing geology and soils within the project area is contained in Section 2.5.4 of this PEIR. Section 4.4 of this PEIR includes a summary of the regulatory framework relative to geology and soils.

5.3.2 Methodology and Assumptions

Potential impacts resulting from implementation of the proposed project were evaluated based on relevant information from the Kearny Mesa Community Plan Update (SCH 2018111024), including the associated Geotechnical and Geological Hazard Evaluation (The Bodhi Group 2018), as well as the City of San Diego Seismic Safety Study (City 2008). Based on a review of relevant maps and geologic documentation, the analysis presents the potential for geological impacts to occur within the project area.

Site conditions may change, and additional data may become available. Data reported and conclusions drawn in this section are limited to current conditions and may not be relied upon at a substantially later date or if changes have occurred in the project area. Reasonable efforts were made to identify geologic hazards. “Reasonable efforts” are limited to information gained from readily accessible public data. Such methods may not identify geologic or geotechnical issues that are not listed in these sources.

5.3.3 Significance Determination Thresholds

Based on the City’s CEQA Significance Determination Thresholds (City 2022a), a significant impact related to geology and soils would occur if implementation of the proposed project would:

1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides;
2. Result in substantial soil erosion or the loss of topsoil; or
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

5.3.4 Impact Analysis

5.3.4.1 Issue 1: Seismic Hazards

Would the proposed project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides?

Fault Rupture and Seismic Ground Shaking

Implementation of the proposed project could result in the exposure of people, buildings, and infrastructure to seismic hazards. Ground shaking during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, and the type of geologic material underlying the area. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Areas that are underlain by bedrock tend to experience less ground shaking than those underlain by unconsolidated sediments such as artificial fill or unconsolidated alluvial fill.

While the project area is not underlain by active or potentially active earthquake faults, the project area could be subject to ground shaking in the event of an earthquake along faults in the Southern California/Northern Baja California region. The nearest active fault capable of causing strong seismic ground shaking is the Rose Canyon fault zone located approximately four miles southwest of the AMP area.

Developments under the proposed project would be required to conform to applicable regulatory/industry and code standards related to geologic hazards, including pertinent elements of the Seismic Hazards Mapping Act, Alquist-Priolo Earthquake Fault Zoning Act, CBC, and related City standards. Structural design in accordance with current building codes would reduce the impact associated with fault rupture and/or seismic ground shaking on buildings to an acceptable level of risk.

Liquefaction and Seismically Induced Settlement

Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction. Among the potential hazards related to liquefaction are seismically induced settlement. Seismically induced settlement is caused by the reduction of shear strength due to loss of grain-to-grain contact during liquefaction and may result in dynamic settlement on the order of several inches to several feet. Other factors such as earthquake magnitude, distance from the earthquake epicenter, thickness of the liquefiable layers, and the fines content and particle sizes of the liquefiable layers also affect the amount of settlement.

According to the City of San Diego Seismic Safety Study (City 2008) the AMP area is not located in an area with high potential for liquefaction (refer to Figure 2-10); however, due to the presence of artificial fill within the AMP area, future development under the proposed project could potentially be subject to liquefaction and seismically induced settlement. Future development activities implemented in accordance with the proposed project would be required to conform to applicable regulatory/industry and code standards related to liquefaction and associated hazards. Specifically, this would involve compliance with pertinent elements of the CBC and related City standards via ground improvement or foundation design. Implementation of appropriate measures would reduce potential impacts related to seismic liquefaction and associated settlement from the proposed project to an acceptable risk.

Landslides

Landslides and other slope failures may occur in hillside areas due to a number of factors including seismic ground shaking or substantial rainfall. Structures, engineered slopes, roadways, utilities, and people located on or below unstable areas could be subject to severe damage or injury. Landslide, debris flows, and surficial material failures affect the area where the material originates, as well as downslope areas where the landslide debris accumulates.

The AMP area is characterized by relatively flat terrain and is underlain by very old paralic deposits, which have high shear strengths and provide the stable cap that creates the mesa on which Kearny Mesa was developed. Historic aerial photographs do not show evidence of large-scale landslides or shallow slope failures in the AMP area (The Bodhi Group 2018). In addition, development implemented under the proposed project would be required to complete a geotechnical investigation and comply with the SDMC and CBC to mitigate potential landslide hazards.

Tsunamis, Seiches, and Dam Failures

A tsunami is a sea wave generated by a submarine earthquake, landslide, or volcanic action. Submarine earthquakes are common along the edge of the Pacific Ocean, thus exposing all Pacific coastal areas to the potential hazard of tsunamis. However, no portion of the AMP area lies within a mapped tsunami inundation zone due to its inland location.

A seiche is an earthquake-induced wave in a confined body of water, such as a lake, reservoir, or bay. The AMP area is not located in proximity to water features capable of generating substantial seiche-related hazards.

An earthquake-induced dam failure can result in a severe flood event. When a dam fails, a large quantity of water can be suddenly released with a great potential to cause human casualties, economic loss, lifeline disruption, and environmental damage. The AMP area is not located within a mapped dam inundation zone (The Bodhi Group 2018).

Summary

Building construction in accordance with the SDMC and CBC would reduce potential seismic hazards to an acceptable level of risk. Therefore, while development under the proposed project could be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure; liquefaction and seismically induced settlement; landslides; or

tsunamis, seiches, or dam failures would be reduced through implementation of site-specific geotechnical requirements associated with future development under the proposed project.

5.3.4.2 Issue 2: Erosion and Sedimentation

Would the proposed project result in substantial soil erosion or loss of topsoil?

Erosion hazards can occur via development-related activities such as excavation/ grading and removal of stabilizing structures and vegetation. Developed areas would be most susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. Erosion and sedimentation are not considered to be long-term concerns in the AMP area, as developed areas would be stabilized through installation of structures/hardscape and landscaping. The AMP area is characterized by relatively level topography.

Future development in the project area could involve grading activities that remove existing pavement and ground cover, thereby exposing soils to potential runoff and erosion during construction if protective measures are not taken. Compliance with City grading requirements would ensure that future construction operations would avoid significant soil erosion impacts. SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the LDM. The regulations prohibit sediment and pollutants from leaving the work site and require the implementation of erosion, sedimentation, and water pollution control measures. Controls shall include measures outlined in Chapter 14, Article 2, Division 2 (Storm Water Runoff Control and Drainage Regulations) that address the development's potential erosion and sedimentation impacts.

Future development in the project area that would disturb less than one acre of land would require implementation of a Water Pollution Control Plan (WPCP), which would include (among other things) erosion and sedimentation control BMPs. Similarly, future development within the project area involving clearing, grading, or excavation that causes soil disturbance that would result in soil disturbance of one or more acres, would be subject to the requirements of the NPDES Construction General Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit). This requires the implementation of a SWPPP (refer to Section 4.7.2.2) and associated BMPs, including appropriate measures to address erosion and sedimentation. Compliance with NPDES and City requirements would reduce the potential for substantial erosion or topsoil loss to occur in the project area. Thus, with adherence to existing regulations, impacts would be less than significant.

5.3.4.3 Issue 3: Geologic Instability

Would the proposed project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Landslides and Slope Instability

Landslides and slope failures typically occur in hillside areas with steep slopes. The majority of the AMP area is characterized by relatively level terrain (refer to Figure 2-10). Nonetheless, all future development implemented by the proposed project would be required to complete a site-specific geotechnical investigation and comply with the SDMC and CBC to prevent potential landslide hazards.

Liquefaction and Lateral Spreading

Liquefaction occurs when loose, saturated granular materials undergo matrix rearrangement, develop high pore water pressure, and lose shear strength. Manifestations of soil liquefaction can include loss of bearing capacity below foundations, surface settlements and tilting in level ground, and instabilities in areas of sloping ground. Soil liquefaction can also result in increased lateral and uplift pressures on buried structures. Lateral spreading occurs on slopes in areas characterized by liquefaction-prone soil.

Future development proposed by the project could be subject to liquefaction due to the presence of artificial fill in the AMP area. Lateral spreading is unlikely to occur because of the level terrain within the AMP area. However, future development activities would be required to conform to applicable regulatory/industry and code standards related to liquefaction and associated hazards, including lateral spreading. Specifically, this would involve pertinent elements of the Seismic Hazards Mapping Act, CBC, and related City standards. Implementation of appropriate measures in conformance with applicable regulatory/industry standards would reduce potential impacts related to liquefaction and lateral spreading to an acceptable risk.

Subsidence and Collapse

Non-seismic soil subsidence is most typically associated with conditions such as karst/limestone terrain (i.e., the formation of subsurface cavities by dissolution of soluble rocks), subsurface mining, large-scale groundwater or oil and gas withdrawal, or decomposition of thick organic (peat) layers. Settlement of unconsolidated soil (fill or alluvium) may occur locally where new loads are imposed on previously uncompacted fill, compacted fill on unconsolidated alluvium, or on unconsolidated alluvium. Subsidence can result in a loss of support capability within the associated soil or formational materials, potentially resulting in damage to surface and subsurface structures such as buildings, pavement, and utilities.

Soil collapse, or near-surface subsidence, is generally associated with: (1) hydroconsolidation, the tendency of unsaturated soils to rapidly lose fine material upon saturation; and (2) water table depression (lowering) due to groundwater withdrawal. Collapse associated with hydroconsolidation is most common in arid and semi-arid areas, with the associated effects generally localized but potentially substantial. Collapse related to groundwater withdrawal generally occurs over a wide region and a longer timeframe (i.e., decades), with less noticeable short-term effects. Soil collapse can result in settlement and related effects to overlying foundations or other improvements.

In areas where artificial fill may have been placed without proper engineering controls and inspections, the material may be susceptible to dynamic consolidation and subsidence, especially in areas where thick artificial fills have been placed against denser old alluvium or bedrock materials.

Future development proposed by the project would be subject to site-specific geotechnical review per applicable regulatory/industry standards (including City and CBC criteria), with associated remedial requirements potentially including efforts such as removal of unstable or unsuitable materials, use of properly engineered fill, and provision of appropriate foundations and/or soil improvements (e.g., deep soil mixing) to provide support to ensure stability.

Expansive Soils

Expansive soils generally contain fine-grained clays susceptible to expansion under wetting conditions and contraction under drying conditions. This swelling and shrinking of the soil can cause damage to slabs, foundations, and concrete flatwork. The AMP area contains formational material and artificial fill that are considered expansive or potentially expansive due to their fine-grained nature and/or clay content. As a result, future development activities in applicable areas within the project area may be subject to potentially significant impacts related to expansive soils.

Future development projects implemented by the proposed project would be required to conform to applicable regulatory/industry and code standards related to expansive soil hazards. Specifically, this would involve pertinent elements of the CBC and related City standards and implementation of associated potential standard remedial efforts to remedy the effects of expansive soil in susceptible areas. A geotechnical investigation would be required in accordance the SDMC to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure that potential hazards associated with expansive soils are minimized. Typical remediation measures include removal/replacement or, if applicable, mixing of unsuitable materials with engineered and non-expansive fill; capping expansive materials with engineered fill in applicable areas; and use of appropriate foundation and/or footing design per development-specific geotechnical recommendations.

Shallow Groundwater

The permanent groundwater table is expected to be too deep to affect geologic and soil conditions associated with future development within the project area. If groundwater is encountered during future development, temporary dewatering to accommodate grading and excavation would be subject to associated requirements under the appropriate NPDES Groundwater Permit.

5.3.5 Significance of Impacts

5.3.5.1 Seismic Hazards

Future development activities associated with the project would be required to comply with applicable regulatory/industry standards and codes, including the CBC and SDMC to reduce potential seismic hazards to an acceptable level of risk. Thus, while the project area could be subject to seismic events, potential hazards associated with ground shaking would be reduced through implementation of site-specific geotechnical requirements associated with future development. Therefore, impacts related to seismic hazards would be less than significant.

5.3.5.2 Erosion and Sedimentation

Future development under the project would be required to comply with applicable regulatory/industry standard and codes, including the SDMC (grading requirements), the City's Storm Water Program, and NPDES requirements to reduce potential impacts related to erosion and sedimentation hazards to an acceptable level of risk. Therefore, impacts would be less than significant.

5.3.5.3 Geologic Instability

Future development activities implemented under the project would be required to comply with applicable regulatory/industry standard and codes, including the SDMC and CBC to reduce potential impacts related to geologic instability to an acceptable level of risk. Potential hazards associated with instability would be addressed by the site-specific recommendations contained within geotechnical investigations as required by the SDMC. Therefore, impacts would be less than significant.

5.3.6 Mitigation Framework

Implementation of the proposed project would result in less than significant impacts to geology and soils. No mitigation is required.

5.4 Greenhouse Gas Emissions

This section of the PEIR addresses potential impacts to GHG emissions that could result from the construction and operation of improvements included within the proposed project. The analysis of non-flight operations, such as vehicular use and building energy use, is based on the *Montgomery-Gibbs Executive Airport Master Plan Update GHG Emissions Technical Report* (HELIX 2025c), which is included as Appendix E of this PEIR. Aircraft-related GHG impacts are based on the *Airport Master Plan Study for Montgomery-Gibbs Municipal Airport – 2037 Forecast Noise and Air Quality Modeling Assumptions Technical Memorandum* (HMMH 2019), which is included as Appendix C.

5.4.1 Existing Conditions

The existing environmental setting, which includes a discussion of existing GHG emissions and inventories is contained in Section 2.4.4 of this PEIR. Section 4.4 of this PEIR includes a summary of the regulatory framework relative to GHG emissions.

5.4.2 Methodology and Assumptions

GHG emissions from the project's proposed construction activities and non-aircraft operational sources were calculated using CalEEMod, Version 2022.1. Non-operational sources of GHG emissions include mobile (transportation sources), area sources, water and wastewater sources, solid waste sources, and refrigerants. GHG emissions from the project's proposed aircraft activity were assessed by HMMH (2019) in accordance with the FAA's *Aviation Emissions and Air Quality Handbook, Version 3, Update 1* (FAA 2015) and were estimated using the AEDT. Additional information pertaining to methodology and assumptions for emissions modeling is contained in Section 5.1, *Air Quality*, of this PEIR.

5.4.3 Significance Determination Thresholds

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

Based on the City's CEQA Significance Determination Thresholds (City 2022a), a significant GHG emissions impact would occur if the implementation of the proposed project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Proposed new development projects that are consistent with the CAP, as determined through compliance with the CAP Consistency Regulations, or as determined from City consistency guidance

for program- and plan level documents and infrastructure projects, may rely on the CAP for the cumulative impact analysis of GHG emissions pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). The environmental analysis for public infrastructure projects should include a discussion of overall consistency with each of the strategies of the 2022 CAP: Strategy 1: Decarbonization of the Built Environment; Strategy 2: Access to Clean and Renewable Energy; Strategy 3: Mobility and Land Use; Strategy 4: Circular Economy and Clean Communities; Strategy 5: Resilient Infrastructure and Healthy Ecosystems; and Strategy 6: Emerging Climate Action (City 2022b).

For aircraft-related emissions, project impacts are compared against the future buildout of the Airport (2037) to determine the change due to the project compared to changes in future aircraft operations that would occur without the project.

5.4.4 Impact Analysis

5.4.4.1 Issue 1: Greenhouse Gas Emissions

Would the proposed project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

Construction activities associated with the implementation of the proposed project would result in emissions of GHGs from the use of construction equipment, from worker and vendor vehicles, and from haul trucks. For the purposes of disclosing the increase in GHG emissions that would occur as a result of the implementation of the proposed project, the analysis within the *Greenhouse Gas Technical Report* developed an inventory of construction emissions using CalEEMod (HELIX 2025c). Table 5.4-1, *Maximum Annual Construction GHG Emissions*, shows the estimated maximum annual construction GHG emissions through the horizon of the proposed project. These maximum annual emissions estimates assume that construction of each improvement task listed in Table 3-6 would occur sequentially without gaps for each construction period, starting in 2026. Actual annual emissions would be lower if construction of improvement tasks were spread throughout each construction period.

**Table 5.4-1
MAXIMUM ANNUAL CONSTRUCTION GHG EMISSIONS**

Construction Period	Annual Emissions (MT CO ₂ e/year)
Near-Term (maximum in 2026)	456.2
Mid-Term (maximum in 2028)	480.5
Long-Term (maximum in 2030)	541.9
Maximum Annual	541.9

Source: HELIX 2025c

MT = metric tons; CO₂e = carbon dioxide equivalent

Non-Flight Operations

Existing sources of non-aircraft related GHG emissions associated with the operation of the Airport include: mobile sources such as exhaust from visitor, pilot, employee, and vendor vehicles; area sources such as the use of landscape maintenance and aviation support equipment; the use of consumer products and paint for cleaning and maintenance; indirect emissions from off-site generation of electric used by Airport buildings; indirect emissions from the treatment and transport of water and wastewater; indirect emissions from the disposal of solid waste; and direct emission from leaks of refrigerants from building HVAC systems and appliances. The proposed increase of 6,400 SF for the terminal building could result in an increase in building energy use. The installation of hangars and aircraft tie-downs could result in additional trips for users of the airport. For the purposes of disclosing the increase in GHG emissions that would occur as a result of implementation of the proposed project, the potential increase in non-aircraft operational emissions resulting from implementation of the project is shown in Table 5.4-2, *Unmitigated Annual Operation GHG Emissions (Non-Aircraft)*.

Table 5.4-2
UNMITIGATED ANNUAL OPERATION GHG EMISSIONS
(NON-AIRCRAFT)

Source	Annual Emissions (MT CO ₂ e/year)
Mobile	178.5
Area	7.1
Energy	72.9
Water and Wastewater	2.2
Solid Waste	16.7
Refrigerants	<0.1
Total Annual	277.3

Source: HELIX 2025c.

MT = metric tons; CO₂e = carbon dioxide equivalent

Aircraft-Related Operations

Sources of aircraft-related GHG emissions associated with the operation of the Airport include aircraft engines and APUs. For disclosure purposes, the potential increase in aircraft operational emissions resulting from the implementation of the project is shown in Table 5.4-3, *Annual Operation GHG Emissions (Aircraft)*.

Table 5.4-3
ANNUAL OPERATION GHG EMISSIONS (AIRCRAFT)

Source	Annual Emissions (MT CO ₂ e/year)
2037 Total Without Project Implementation	7,439.4
2037 Total With Project Implementation	7,492.3
Net Change	52.9

Source: HMMH 2019.

MT = metric tons; CO₂e = carbon dioxide equivalent

CAP Consistency

To determine the significance of GHG emissions attributable to the implementation of the proposed project, the project was evaluated for consistency with the City's CAP consistency regulations utilizing the City's Implementation Strategies and guidance memo for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects (City 2022c). These Strategies outline how the City will achieve GHG reductions through the following:

Strategy 1: Decarbonization of the Built Environment

The City has adopted a goal to achieve zero emissions in municipal buildings and operations by 2035. If any new project building or renovation of existing buildings were to utilize natural gas, the project would be inconsistent with the City's 2022 CAP, resulting in a potentially significant impact.

Strategy 2: Access to Clean & Renewable Energy

Similar to Strategy 1, above, if any new project building or renovation of existing buildings were to utilize natural gas, the project would be inconsistent with State goals and City 2022 CAP goals for 100 percent renewable energy, resulting in a potentially significant impact.

Strategy 3: Mobility & Land Use

The Airport is not within a transit priority area (TPA) designated by the City. The project would not conflict with City plans for bicycle, pedestrian, or transit infrastructure improvement projects, or conflict with Strategy 3 of the City's 2022 CAP.

Strategy 4: Circular Economy & Clean Facilities

The City ordinance Article 6, Division 6, Construction and Demolition Debris Diversion Deposit Program, requires all applicants for a Building Permit or a Demolition/Removal Permit to submit a Waste Management Form and divert 75 percent by weight of the total construction and demolition debris to a certified recycling facility. Because some construction and demolition activities associated with the project may not be subject to the City's Construction and Demolition Debris Diversion Deposit Program ordinance, if a minimum of 75 percent of all project construction and demolition debris (including pavement) would not be diverted to a certified recycling facility, the project would be inconsistent with Strategy 4 of the City's 2022 CAP, resulting in a potentially significant impact.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

The project does not include the removal of existing trees or the planting of new trees on streets within the public right-of-way of streets. The project would not conflict with Strategy 5 of the City's 2022 CAP.

Strategy 6: Emerging Climate Action

The project would not conflict with or obstruct the implementation of any State or City emerging CAP, goal, or strategy (e.g., carbon capture). The project would not conflict with Strategy 6 of the City's 2022 CAP.

Without requiring all new or renovated project buildings to be all electric and requiring a 75 percent construction and demolition debris diversion rate, the project would be inconsistent with the City's 2022 CAP requirements for infrastructure projects. Therefore, the impact would be potentially significant.

5.4.4.2 Issue 2: Conflict with Plans or Policies

Would the proposed project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The project was analyzed for conflicts with the City's 2022 CAP, the Regional Plan; and the CARB 2022 Scoping Plan.

City of San Diego 2022 Climate Action Plan

As discussed above, without requiring all new or renovated project buildings to be all electric and requiring a 75 percent construction and demolition debris diversion rate, the project would be inconsistent with the City's 2022 CAP resulting in a potentially significant impact.

San Diego Association of Governments Regional Plan

The purpose of the Regional Plan is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout San Diego County as stipulated under SB 375. Implementation of the project would not result in regional residential growth and the Airport is not within a TPA identified in the Regional Plan. Therefore, the proposed project would not conflict with the goals and measures of the Regional Plan for the reduction of transportation-related GHGs.

California Air Resources Board 2022 Scoping Plan

There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 requires further reductions of 40 percent below 1990 levels by 2030. Beyond 2030, AB 1279 aims to achieve carbon neutrality in the state by 2045. The 2022 Scoping Plan lays out a path for achieving the regulatory requirements of AB 32, SB 32, and AB 1279. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing proportion of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed Project does not conflict with State GHG reduction plans and regulations.

5.4.5 Significance of Impacts

5.4.5.1 Greenhouse Gas Emissions

Without requiring all new or renovated project buildings to be all electric and requiring a 75 percent construction and demolition debris diversion rate, the project would be inconsistent with the City's

2022 CAP requirements for infrastructure projects. Therefore, the impact would be potentially significant.

5.4.5.2 Conflict with Plans or Policies

Without requiring all new or renovated project buildings to be all electric, and requiring a 75 percent construction and demolition debris diversion rate, the project would be inconsistent with the City's 2022 CAP. Therefore, the project could conflict with the City's CAP, and the impact would be potentially significant.

5.4.6 Mitigation Framework

The following mitigation measures would ensure consistency with the City's 2022 CAP:

MM GHG-1 Prohibition of Natural Gas Use in City Facilities. To facilitate the City's goal of achieving zero carbon emissions for municipal buildings and operations by 2035, the City shall require and verify the specification on the applicable plans that no natural gas appliances or natural gas plumbing are included in new City-owned and operated buildings prior to project design approval. Further, for existing City-owned buildings, the City shall replace existing fossil-fuel energy sources with electric or renewable energy sources as those buildings are scheduled for upgrades. For facilities identified as historically significant, such upgrades would need to comply with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

MM GHG-2 Construction and Demolition Waste Diversion. Prior to issuing building or demolition permits, or approving construction contracts that include building or pavement demolition for any AMP implementation project, the City shall require completion of a Waste Management Form Part I, and all debris diversion and verification requirements specified in the City of San Diego Municipal Article 6, *Collection, Transportation and Disposal of Refuse and Solid Waste*; Division 6, *Construction and Demolition Debris Diversion Deposit Program*.

Designing new and renovated project buildings to be all-electric would replace natural gas energy use with electric energy use. The effect of MM GHG-1 is shown in Table 5.4-4, *Mitigated Annual Operation GHG Emissions (Non-Aircraft)*.

Table 5.4-4
MITIGATED ANNUAL OPERATION GHG EMISSIONS (NON-AIRCRAFT)

Source	Annual Emissions (MT CO ₂ e/year)
Mobile	178.5
Area	7.1
Energy	66.7
Water and Wastewater	2.2
Solid Waste	16.7
Refrigerants	<0.1
Total Annual	271.1

Source: HELIX 2025c.

MT = metric tons; CO₂e = carbon dioxide equivalent

As shown in Table 5.4-4, the calculated mitigated GHG emissions would result in 271.1 MT CO₂e per year, a decrease of 6.8 MT CO₂e per year. The mitigated modeling replaced the natural gas energy use with the equivalent quantity of electrical energy, and the modeling does not account for the increased energy efficiency of electric appliances (e.g., hot water heaters and furnaces/heat pumps) compared to natural gas appliances. In addition, the calculated GHG emissions are for the year 2032. Beyond 2032, the indirect GHG emissions from electricity use would decrease and eventually approach zero GHG emissions as the state's electricity supply is decarbonized.

5.4.7 Significance of Impacts After Mitigation

5.4.7.1 Greenhouse Gas Emissions

With the implementation of MM GHG-1 and MM GHG-2, the project would be consistent with the City's 2022 CAP and would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impact would be less than significant with mitigation incorporated.

5.4.7.2 Conflict with Plans or Policies

With the implementation of MM GHG-1 and MM GHG-2, the project would be consistent with the City's 2022 CAP. Impact would be less than significant with mitigation incorporated.

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5.5 Historical, Archaeological, and Tribal Cultural Resources

This section of the PEIR addresses potential impacts related to historical, archaeological, and tribal cultural resources that could result from implementation of the project. This section is based on the *Montgomery-Gibbs Executive Airport Master Plan Cultural Resources Technical Report* (HELIX 2025d) and the *Historical Resource Technical Report for Montgomery-Gibbs Executive Airport Building 6, Building 7 & Building 8* (IS Architecture 2025). These reports are included as Appendix G and Appendix H, respectively.

5.5.1 Existing Conditions

The existing environmental setting, which includes a detailed discussion of the historical background of the San Diego region and Kearny Mesa area is contained in Section 2.4.6 of this PEIR. Section 4.5 of this PEIR includes a summary of the regulatory framework relative to historical, archaeological, and tribal cultural resources. Additional relevant information is provided below.

5.5.2 Methodology and Assumptions

5.5.2.1 Historic Structures, Objects, or Sites

The Kearny Mesa Community Planning Area Historic Context Statement (IS Architecture 2019) called out three existing hangars and the ATCT at the Airport in relation to the historic context for the Kearny Mesa area. During the AMP planning process, the three hangars were considered for potential demolition. As such, a Historical Resources Technical Report (HRTR) was prepared by IS Architecture (2025) to evaluate the historical designation status of three existing hangars at the Airport. While the hangars are no longer proposed to be demolished, the results of evaluation in the HRTR are provided herein. The ATCT was determined to be sufficient under existing conditions (refer to Section 3.2.3.5 of this PEIR), and therefore no improvements are proposed to the ATCT. As such, the HRTR did not include an evaluation of the ATCT or other built resources within the AMP area. The evaluation in the HRTR for the three hangars included a literature review, which involved the review of several cultural resources reports on file with the City. In addition, a pedestrian field survey was conducted by IS Architecture staff on February 27, 2019 during which staff photographically documented the conditions at the site.

5.5.2.2 Prehistoric and Historic Archaeological Resources

A Cultural Resources Technical Report was prepared by HELIX (2025d) to evaluate the potential for impacts to cultural resources from implementation of the project. The cultural resources study included a records search of the California Historical Resources Information System, on file at the SCIC, a Sacred Lands File (SLF) search, a Native American contact program, a review of historic aerial photographs and maps, a review of existing documentation, and a pedestrian field survey.

5.5.2.3 Tribal Cultural Resources

HELIX initiated a Native American Contact Program with local tribes and tribal representatives to identify tribal cultural resources considered significant to the local Native American community. The NAHC was contacted for a search of their SLF on August 22, 2017. A response was received from the NAHC on August 28, 2017; a search of their SLF was completed with negative results for the airport property. HELIX contacted the tribal entities identified by the NAHC regarding the proposed AMP study on August 30, 2017; one response was received. On September 7, 2017, the Viejas Band of Kumeyaay Indians responded that the AMP area may contain many sacred sites to the Kumeyaay people. They requested that these sacred sites be avoided with adequate buffer zones. Additionally, they requested that all applicable federal and state laws be followed and that they are immediately contacted on changes or inadvertent discoveries.

5.5.3 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's CEQA Significance Determination Thresholds (City 2022a), consist first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation.

Based on the City's CEQA Significance Determination Thresholds, impacts to historical, archaeological, and tribal cultural resources would be significant if the proposed project would result in any of the following:

1. An alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site;
2. A substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries; or
3. A substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The City of San Diego's CEQA Significance Determination Thresholds define a significant historical resource as one that qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the PRC, although

even a resource that is not listed in or determined eligible for listing in the CRHR, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA. The City's Historical Resources Guidelines state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process.

Research priorities for the prehistoric, ethnohistoric, and historic periods of San Diego history are discussed in Appendix A to the City's Historical Resources Guidelines. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50-square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.
- The determination of significance for historic buildings, structures, objects, and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.
- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

5.5.4 Impact Analysis

5.5.4.1 Issue 1: Historic Structures, Objects, or Sites

Would the proposed project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?

Under CEQA, historical resources are defined as resources listed in or determined to be eligible for listing in the NRHP, the CRHR, and the San Diego Register of Historic Resources (SDRHR). Generally, resources that are found to be eligible under the NRHP are subsequently eligible under both the state criteria for the CRHR and the local criteria for the SDRHR.

To be eligible for designation on the NRHP, a resource must both have significance under one or more Significance Criteria (listed below) and retain sufficient integrity to convey that significance in its current state.

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

Integrity is the ability of a property to convey its significance. Within the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity as defined below:

- Location: The place where the historic property was constructed or the place where the historic event occurred.
- Setting: The physical environment of a historic property.
- Design: The combination of elements that create the form, plan, space, structure, and style of a property.
- Materials: The physical elements that were combined or deposited during a particular period of time and in a pattern or configuration or form a historic property.
- Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling: The property's expression of the aesthetic or historic sense of a particular period of time.
- Association: The direct link between an important historic event or person and a historic property.

A review of the literature, prior research and evaluation, as well as a field survey determined that within the AMP area there are three hangars that have the potential to both meet one or more of the NRHP criteria and have retained historical integrity. The hangars, referred to as Buildings 6, 7, and 8 are located along the western perimeter of the AMP area, north of the existing hotel and south of SR 163 (see Figure 2-11, Historic Resources, and Figure 2-12, Historic Hangars, Buildings 6, 7, and 8).

All three buildings meet the significance standards for Criterion A, as they are associated with a pattern of important events that shaped the development of MYF and by extension influenced the

entire development of the community of Kearny Mesa. Building 6 also meets the significance standards for Criterion C, as it embodies the distinctive characteristics of the Quonset Hut, which is an important building type that was developed by the U.S. Navy during World War II. Buildings 7 and 8 do not meet the significance standards for Criterion C and none of the three buildings meet the significance standards established for Criteria B and D. All three buildings do exhibit all seven aspects of integrity; thus, Buildings 6, 7, and 8 are eligible for listing on the NRHP and are a significant historical resource under CEQA. Since these buildings are found to be significant under the NRHP criteria they are also found to be significant under the equivalent CRHR significance criteria.

Additionally, the Historical Resources Guidelines of the City's LDM identifies the criteria under which a resource may be historically designated. It states that any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated a historical resource on the SDRHR by the City's HRB if it meets one or more of the following HRB designation criteria:

- Criterion A: Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development.
- Criterion B: Is identified with persons or events significant in local, state or national history.
- Criterion C: Embodies distinctive characteristics of style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.
- Criterion D: Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman.
- Criterion E: is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office for listing on the California Register of Historic Resources.
- Criterion F: is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

All three buildings meet the SDRHR standards for Criterion A because they reflect a special element of Kearny Mesa's historical development. Specifically, the three hangars reflect the airfield created by Bill Gibbs, which was the earliest known development to have occurred in Kearny Mesa. As such, these hangars influenced both the development of Montgomery Field, presently named Montgomery-Gibbs Executive Airport, which by extension, influenced the development of the entire community of Kearny Mesa. Building 6 also meets the SDRHR standards for Criterion C, as embodies the distinctive characteristics of the Quonset Hut.

Buildings 6, 7, and 8 are not proposed to be demolished or otherwise affected as part of the project and would be retained in their current state and location. However, any unplanned maintenance, repairs, or stabilization to the historic hangars would have the potential to cause a substantial

adverse change in the significance of the hangars. As such, impacts are considered potentially significant.

Future improvements under the project would have the potential to affect other, unevaluated buildings and structures that will be 45 years of age at the time of the improvements, including the terminal building, which was originally constructed in 1969. Because these buildings and structures may be eligible at that time for listing in the NRHP, CRHR, and/or SDRHR and therefore potentially considered historical resources, impacts are considered potentially significant.

5.5.4.2 Issue 2: Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Would the proposed project result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?

The Cultural Resources Technical Report prepared by HELIX (HELIX 2025d) identified four previously recorded prehistoric archaeological sites and one prehistoric isolate within one-half mile of the AMP area. The only previously recorded archaeological resource formally documented within the boundary of the AMP area is a prehistoric isolate (P-37-023983), consisting of two quartzite flakes. The isolate is described as consisting of a grey, secondary, quartzite flake and a red, secondary, quartzite flake, found approximately eight meters apart. As no other cultural materials were observed with the flakes, they were recorded as an isolate. This isolate is located adjacent to the north-central boundary of the AMP area, but outside of the project's proposed impact area. As such, no impacts to this resource would occur.

One of the prehistoric sites consists of a 'resource' recorded in the 1920s (SDM-W-155) that includes an over 20-square-mile area of Kearny Mesa. SDM-W-155 was recorded by Malcom Rogers of the San Diego Museum of Man as the entirety of Kearny Mesa, including the Linda Vista, Clairemont, University City, Kearny Mesa, and Miramar community areas, and was described as dispersed highland winter camps with scattered artifacts and cobble hearths (Rogers n.d.). In 1980, Ken Hedges, curator of the Museum of Man, indicated the boundaries of the site as "Mission Valley on the south, Mission Bay and Rose Canyon on the west and north, Carroll Canyon on the north, and the Poway Hills and Murphy Canyon on the east" (Hedges 1980). According to Hedges, the locations of the loci associated with the resource were provided on a map compiled by Rogers in approximately 1930; based on the map and Roger's notes, Hedges identified 13 specific loci for SDM-W-155, primarily indicated as hearths; however, as he notes, "the boundaries for these loci consist of contours defining the high points of the mesa-top terrain; these indicate areas within which we have no specific locational data for individual features or artifact finds. This area may contain site loci not represented on this list" (Hedges 1980).

In 1995, one of the loci recorded by Rogers and mapped by Hedges was attributed by Brian F. Smith & Associates to a resource, P-37-014216 (CA-SDI-14048), located in the community of Linda Vista (Pierson 1995). Consequently, SDM-W-155 has been documented at the SCIC as being associated with only that resource number. While some of the individual loci have possibly been documented as separate sites, no other trinomial or primary numbers have been assigned to SDM-W-155 by the

SCIC. As such, no information delineating the extent and the locations of the 13 loci attributed to SDM-W-155 is currently available to address what elements may have existed within the AMP area.

No new archaeological resources were identified during the pedestrian survey of the AMP area. In addition, the archaeological sensitivity of the Airport property is considered low, based on the results of the Cultural Resources Technical Report, environmental factors, and the amount of modern development that has previously occurred for the airport. As such, no impacts to archaeological resources are anticipated to occur.

The disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is governed by the state (AB 2641 [Coto], CAL-NAGPRA of 2001 [H&SC 8010-8030], H&SC Section 7050.5, and PRC Section 5097.98) and federal (i.e., NAGPRA [USC 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin would be turned over to the appropriate Native American group for repatriation. However, since human remains may be discovered and affected during ground-disturbing activities, impacts are considered potentially significant.

5.5.4.3 Issue 3: Tribal Cultural Resources

Would implementation of the proposed project result in a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Pursuant to AB 52, a CEQA lead agency must consult with any California Native American tribe that requests consultation and that is traditionally and culturally affiliated with the geographic area of a proposed project to identify resources of cultural or spiritual value to the tribe, even if such resources are already eligible as historical resources as a result of cultural resources studies.

Tribal consultation notices in accordance with AB 52 were delivered by the City of San Diego to representatives from the Lipay Nation of Santa Ysabel, the Jamul Indian Village, and the San Pasqual Band of Mission Indians on July 12, 2024. The Cultural Resources Technical Report, as well as confidential data, was provided to all representatives to assist with their review in determining if the AMP area contains any Tribal Cultural Resources or areas of tribal importance that would require further evaluation or special consideration during the environmental review process. The City received one response requesting to consult from the San Pasqual Band of Mission Indians on July 12, 2024. Upon attempting to schedule an AB-52 consultation meeting, the tribe did not respond to two follow-up communications (July 16, 2024 and August 14, 2024). No additional requests to consult were received to date.

The results of the records search, SLF search, Native American contact program, and pedestrian field survey did not identify any Tribal Cultural Resources within the project's direct impact area. As such, no impacts to Tribal Cultural Resources are anticipated as a result of the planned development at MYF.

5.5.5 Significance of Impacts

5.5.5.1 Historic Structures, Objects, or Sites

While Buildings 6, 7, and 8 are eligible for listing on the NRHP, CRHR, and SDRHR and are therefore considered historical resources under CEQA, they are not proposed to be demolished or otherwise affected as part of the project and would be retained in their current state and location. However, any unplanned maintenance, repairs, or stabilization to the historic hangars would have the potential to cause a substantial adverse change in the significance of the hangars. As such, impacts are considered potentially significant.

Future improvements proposed by the project would have the potential to affect other, unevaluated buildings and structures that will be 45 years of age at the time of the improvements. Because these buildings and structures may be eligible at that time for listing in the NRHP, CRHR, and/or SDRHR and therefore potentially considered historical resources, impacts are considered potentially significant.

5.5.5.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

No previously recorded archaeological resources are within the project's direct area of potential effect. In addition, no new archaeological resources were identified during the pedestrian survey and the archaeological sensitivity of the Airport property is considered low. As such, impacts to archaeological resources are considered less than significant.

No known burial sites or cemeteries exist within the project's direct area of potential effect and it is not expected that human remains would be disturbed as a result of the project. However, the inadvertent discovery of human remains during ground-disturbing activities remains a possibility. As such, impacts are considered potentially significant.

5.5.5.3 Tribal Cultural Resources

No Tribal Cultural Resources within the project's direct impact area were identified during the records search, SLF search, Native American contact program, or pedestrian field survey. As such, no significant impacts to Tribal Cultural Resources are anticipated as a result of the planned development at MYF.

5.5.6 Mitigation Framework

5.5.6.1 Historic Structures, Objects, or Sites

MM HIST-1 Secretary of the Interior's Standards for the Treatment of Historic Properties. Further development of any preservation projects for Building 6, Building 7, or Building 8 in the event of currently unplanned maintenance, repairs, or stabilization shall be done in compliance with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties. These are:

Standards for Preservation

1. *A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.*
2. *The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*
3. *Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.*
4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*
5. *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
6. *The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color and texture.*
7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*
8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

The City shall engage a qualified historic architect and/or architectural historian (pursuant to the Secretary of the Interior's Professional Qualifications in 36 CFR Part 61) to consult on the projects' development and analyze the final project scope for Compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties

MM HIST-2 Evaluation of Historic Resources. In accordance with the City of San Diego's Historical Resources Regulations (SDMC Chapter 14, Article 3, Division 2), prior to the issuance of any permit for a development project implemented under the AMP that would directly or indirectly affect any unevaluated buildings or structures, or those that will be 45 years or older at the time of specific improvements implemented under the AMP, the City shall determine whether the affected building/structure meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, (3) San Diego Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, the required permit(s) will be processed and all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures may include, but are not limited to:

- a. Conducting a Historic American Building Survey and Historic American Engineering Record;
- b. Preparing a historic resource management plan;
- c. Designing new construction that is compatible in size, scale, materials, color, and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- d. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- e. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource;
- f. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning; and
- g. Removing industrial pollution at the source of production.

Specific types of historical resource reports, outlined in Section III of the Historical Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

5.5.6.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

MM HIST-3 Human Remains. In the event that human remains are discovered during any project activities associated with the AMP, the County Coroner shall be contacted. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. All requirements of H&SC §7050.5 and PRC §5097.98 shall be followed.

5.5.7 Significance of Impacts After Mitigation

5.5.7.1 Historic Structures, Objects, or Sites

Implementation of mitigation measures MM HIST-1 and MM HIST-2 would ensure that improvements associated with the proposed project would conform to the Secretary of the Interior's Standards and would therefore reduce potential impacts to below a level of significance, pursuant to CEQA Guideline §15064.5[b][1], which states:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

5.5.7.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Implementation of mitigation measure MM HIST-3 would require the proper notification, treatment, and disposition of discovered human remains. Therefore, mitigation measure MM HIST-3 would reduce potential impacts related to human remains to below a level of significance.

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5.6 Human Health, Public Safety, and Hazardous Materials

This section of the PEIR addresses potential impacts related to health and safety that could result from implementation of the project. Portions of this section are based on information from the Hazardous Material Technical Study prepared by the Bodhi Group, Inc. (The Bodhi Group 2019) which is included as Appendix F of this PEIR.

5.6.1 Existing Conditions

The existing environmental setting, which includes a description of existing conditions relative to hazardous materials sites, wildfire hazards, emergency preparedness, and aircraft hazards with and adjacent to the AMP area, is contained in Section 2.5.6 of this PEIR. Section 4.6 of this PEIR includes a summary of the regulatory framework associated with health and safety.

5.6.2 Methodology and Assumptions

The analysis of wildfire risk is based on review of CAL FIRE's and the City's VHFHSZ maps. State law requires local jurisdictions to identify VHFHSZs within their local responsibility areas. A local jurisdiction's mapping is based on CAL FIRE's mapping. Under state law, a local agency cannot decrease the level of Fire Hazard Severity Zone in a local responsibility area recommended by CAL FIRE. A local agency can only make additions to or increase the level of Fire Hazard Severity Zone recommended by CAL FIRE. Inclusion within these zones is based on vegetation density, slope severity and other relevant factors that contribute to fire severity. The City's maps, which were last updated in 2025, are maintained by the City's Fire-Rescue Department.

The *Hazardous Materials Technical Study* prepared for the proposed AMP (see Appendix F) includes a search of pertinent federal, state and local regulatory agency database records; a search of regulatory records; and historical land use information from readily available public records (The Bodhi Group 2019). Although the search identified known sites and locations where hazardous materials have been stored, dispensed, conveyed, or spilled, only sites with documented hazardous material releases and oversight by a regulatory agency (local or state agency) are considered to have conditions that could present a risk to human health or the environment.

5.6.3 Significance Determination Thresholds

Based in the City's Significance Determination Thresholds (City 2022a), as modified to guide a programmatic analysis of the proposed project, impacts related to human health, public safety, and hazardous materials would be significant if implementation of the proposed project would:

1. Expose people or structures to a significant loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
2. Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

3. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;
4. Be located on a site included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment; or
5. Be located on or near known contamination sources or meet one or more of the following criteria:
 - Be located within 1,000 feet of a known contamination site.
 - Be located within 2,000 feet of a known “border zone property” (also known as a “Superfund” site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
 - Be on located on a site with a closed Department of Environmental Health case file.
6. Create a significant hazard to the public or environment through the reasonably foreseeable upset or accidental conditions involving the release of hazardous materials into the environment?
7. Result in a safety hazard for people residing or working in a designated airport influence area?
8. Result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Threshold 8 is not applicable to the proposed project as the Airport is covered by an adopted Airport Land Use Compatibility Plan. Potential safety hazards associated with the project are discussed under Threshold 7.

5.6.4 Impact Analysis

5.6.4.1 Issue 1: Wildland Fire Risk

Would implementation of the proposed project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The potential for wildland fires represents a hazard, particularly on undeveloped properties or where development exists adjacent to open space or within proximity to wildland fuels. State law requires that all local jurisdictions identify VHFHSZ within their areas of responsibility (California Government Code Sections 51175–51189). These maps, which are prepared by the City in collaboration with CAL FIRE determine fire hazards zones based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

As discussed in Chapter 2.0, according to CAL FIRE mapping the AMP area is not located within a VHFHSZ, though the eastern portion of the AMP area is mapped as within a Moderate Fire Hazard Severity Zone (CAL FIRE 2025). However, according to the City's proposed mapping, all but the developed central portion of the AMP area is within a VHFHSZ (City 2025). Future development or activity under the proposed project could therefore be at risk from exposure to wildland fires. Such development, however, would be subject to applicable state and City regulatory requirements related to fire hazards and prevention, as outlined in Section 4.6. Specifically, these encompass standards associated with vegetative (brush) management, such as selective removal/thinning and fire-resistant plantings to create appropriate buffer zones around development, as well as incorporating applicable fire-related design elements, including fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. These requirements would be implemented as part of individual improvements associated with the project. Overall, the improvements proposed by the project would not substantially increase the risk of wildland fires at the Airport over existing conditions based on the similarity of the proposed uses to existing uses. In addition, the project area would continue to be serviced by SDFD Station 28, located adjacent to the project area. Therefore, impacts associated with wildfire hazards would be less than significant.

5.6.4.2 Issue 2: Hazardous Emissions and Materials in Proximity to Schools

Would implementation of the proposed project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

There are six existing schools within one-quarter mile of the AMP area, including Le Lycée Français de San Diego, Soille San Diego Hebrew Day School, San Diego College of Continuing Education North City Campus, Angier Elementary School, SET High School, and Imagine Montessori Bilingual Preschool. Construction and operation activities associated with the project would require transportation and use of fuels, lubricants, oils, paints, solvents, and other standard hazardous materials. These materials are not acutely hazardous. In addition, the hazardous substances used during construction and operations would be required to comply with existing federal, state, and local regulations regarding the use and disposal of these materials. Operation of the Airport would be similar to existing conditions and would not introduce new hazardous materials near local schools. Therefore, construction and operation of the improvements under the project would result in less-than-significant impacts to nearby schools related to the use of hazardous materials.

In addition, as discussed in Section 5.1, *Air Quality*, construction of improvements within the AMP would not expose sensitive receptors to substantial concentrations of DPM, asbestos, or lead or other TACs. Long-term operation of the Airport would not result in significant increased incremental excess cancer risks to sensitive receptors from localized concentrations of lead in aircraft exhaust, or from long-term emissions of other toxic substances (refer to Section 5.1 for further analysis and discussion). Impacts would be less than significant.

5.6.4.3 Issue 3: Emergency Response Plans

Would implementation of the proposed project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

As discussed in Section 2.5.6.4 of this PEIR, the City is a participating entity in the MHMP (County 2023), which is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. As part of this effort, the San Diego Office of Homeland Security oversees emergency preparedness and response services for disaster-related measures, including administration of the Emergency Operations Center (EOC) and alternate EOC. For emergency evacuation, the EOP identifies I-15, SR-52, SR-163, and I-805 as emergency evacuation routes in the vicinity of the AMP area.

As is shown in Figure 3-4, *Staging Areas and Haul Routes*, construction of individual improvement tasks under the project would generally not involve haul truck routes outside of the boundaries of the Airport and no temporary road closures or diversions that could affect vehicular or aircraft circulation are anticipated. Implementation of the project would occur entirely within the boundaries of the existing Airport and the project would not introduce any land uses not already considered in the current emergency response plans. Additionally, construction and operation of the project would not place any temporary or permanent physical barriers on any existing public streets. Thus, it is not anticipated that construction or operation of the improvements proposed as part of the project would interfere with or diminish the capacity of programs and facilities to continue to provide effective emergency response or allow for sufficient emergency evacuation within the Airport and surrounding areas.

Lastly, in accordance with FAA AC 150/5200-31 airports maintain an Airport Emergency Plan (AEP). The AEP addresses essential emergency related and deliberate actions planned to ensure the safety of and emergency services for the airport populace and the community in which the airport is located. The AEP document should be functionally oriented, comprehensive in the assignment of responsibilities, and coordinated at all levels. Improvements occurring as part of the project, such as demolition and reconfiguration of taxiways, would not substantially impair implementation of the AEP or other emergency response in the AMP area because the improvements would be phased (i.e., not all occurring at once) and each would occur over a relatively small area. As such, emergency access routes would be maintained within the AMP area. Required adherence to the AEP further assures that implementation of the project would not impair or interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant.

5.6.4.4 Issue 4: Hazardous Materials Sites

Would the improvement projects within the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

As discussed in Section 2.5.6 of this PEIR, The Bodhi Group conducted a review of federal, state, regional, and local environmental regulatory databases, which revealed 12 records of potential environmental concern, of which 10 record locations are located within the boundaries of the Airport and two properties are within one-eighth of a mile of the Airport (see Figure 2-13).

The Bodhi Group conducted site reconnaissance to identify areas within the AMP area of potential environmental concern. Ms. Brianne Cortright conducted the reconnaissance on March 14, 2019, and was escorted by Mr. Wayne Reiter, the Airports Program Manager at the time. The site reconnaissance consisted of driving along accessible portions of the Airport to view areas of

potential hazardous material storage, disposal, or applications. Please see Appendix F for additional details.

Areas observed during the site reconnaissance of potential environmental concern include the following:

- Crownair Aviation (3753 John J. Montgomery Drive). Crownair Aviation (Crownair) operates a fueling station which includes an aviation fuel dispenser, two 20,000-gallon USTs (one containing Jet A fuel and one containing aviation gas), and one 850-gallon aviation fuel truck, one 2,400-gallon and one 3,000-gallon trucks for Jet A fuel. The fueling station is located south of the runways, in the central portion of the Airport. The dispenser and fuel trucks appeared in good condition, were on secondary containment, and no staining or evidence of a release were observed.
- Former Gibbs Flying Service (3717 John J. Montgomery Drive). The former Gibbs Flying Service (Gibbs) was located east of John J. Montgomery Drive in the south portion of the Site. Gibbs operated two 12,000-gallon underground fuel tanks (one contained Jet A fuel and the other contained aviation fuel) and two 2,000-gallon ASTs. The ASTs were specifically used for motor fuel gasoline. All four of the tanks were located on the Gibbs fuel farm adjacent to the north of Aero drive. Gibbs Aviation Services also operated six fuel trucks containing Jet A and Aviation Gas fuels. Two 2,200-gallon trucks and one 1,200-gallon truck provided Jet A fuel for the airport. Aviation gas was provided by a 750-gallon truck, a 1,000-gallon truck, and a 1,200-gallon truck. The various tanks and fuel farm have been removed from the property.
- Former City Helicopter and Fuel Truck Area. According to Mr. Reiter, a helicopter and fuel truck were previously stationed south of the runway and northwest of Gibbs Flying Service. A concrete pad remains in the location where the helicopter was previously parked. The surrounding area is unpaved, and stains were not observed in the area.
- Former Fire Truck Parking. Mr. Reiter also stated a fire truck with a 500-gallon tank was previously stored in a shed located in the central portion of the Airport. Mr. Reiter was unsure of the firefighting fluid stored in the truck. Based on previous research by the Bodhi Group regarding Aqueous film forming foam (AFFF), it was likely water in the tank and is possible that class B material (AFFF foam) was stored separately on the truck and mixed with the water when needed for a petroleum fire, as class B fire equipment is more commonly used at airports. Staining or evidence of a release was not observed near the shed.
- Area Near Fire Station 28. A fire station is not located within the Airport; however, a San Diego City Fire Station is located adjacent to the western portion of the Airport, beyond Kearny Mesa Road, and is responsible for responding to emergencies at the airport. According to Mr. Reiter, the firefighters occasionally perform training in an unpaved area north of the hotel and may have practiced with water/AFFF foam.
- Landfill. The Montgomery Demolition Closed Landfill is located in the southeast portion of the Airport. The landfill was not viewed during the site reconnaissance due to muddy road conditions; however, because it accepted demolition debris only, landfill gas wells were not installed. The landfill is inspected annually.

Based on a review of the records, site reconnaissance, and interviews with onsite operators, the Bodhi Group determined that development, redevelopment, and future operations included as part of the project could potentially expose people or sensitive receptors to hazardous materials and/or waste. The sources of contamination potentially include the following:

- Unauthorized releases of petroleum from storage systems such as USTs and ASTs can result in impacts from petroleum hydrocarbons, which can contain chemicals of concern in the volatile and non-volatile fractions as discussed previously;
- Unauthorized releases of petroleum products, waste oil, and solvents from vehicle/equipment maintenance and storage that can result in impacts from petroleum hydrocarbons, CVOCs, and metals;
- Lead in shallow soil from ADL and LBP;
- Asbestos from building material;
- Unauthorized releases of Polychlorinated Biphenyls (PCBs) from electrical equipment, including transformers, waste oil, and building materials that may have contained PCBs; and
- Releases of ECCs into soil and groundwater from firefighting training or storage (AFFF can result in PFAS impacts).

The five potentially complete pathways of exposure of contaminants to receptors are listed below:

- Long term exposure and potential risks to human health from vapor intrusion of volatile chemicals into occupied structures;
- Long-term exposure to hazardous chemicals in groundwater that may be a source of drinking water and other beneficial municipal use;
- Long-term direct exposure of occupants to hazardous chemicals in soil through dermal contact.
- Short-term direct exposure of construction workers to hazardous chemicals in soil through dermal contact.
- Short-term inhalation exposure of construction workers and the public to potential chemicals in dust generated by construction (lead, asbestos, polynuclear aromatic hydrocarbons, PCBs, and organochlorine pesticides).

Future development and redevelopment activities under the project would be required to adhere to applicable regulatory/industry and code standards related to health hazards from hazardous materials. Specifically, this would involve compliance with pertinent federal, state, and local standards related to hazardous materials, as outlined in Section 4.6, including discretionary approval from the County DEH/HMD for all applicable projects proposed within the AMP area. This would entail receipt of clearance from the County DEH/HMD as the local CUPA, including remediation efforts for applicable locations.

However, although compliance with existing regulations would minimize impacts associated with hazardous materials, impacts remain potentially significant due to the potential exposure to construction workers and the public during implementation of the project improvements.

5.6.4.5 Issue 5: Areas of Potential Environmental Concern

Is the project located within 1,000 feet of a known contamination, within 2,000 feet of a known Superfund site, or have a closed Department of Environmental Health file?

The project is not located within 2,000 feet of a Superfund site (The Bodhi Group 2019). As noted above there are properties within the AMP area that are subject to land use change notification requirements as stipulated by the DEH. None of the properties that are subject to the DEH land use restrictions are in areas that have been identified for improvements under the project. However, due to the potential for exposure to hazardous materials as described under Issue 4, impacts are conservatively assumed to be potentially significant.

5.6.4.6 Issue 6: Upset or Accidental Release of Hazardous Materials

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

Implementation of the project would not introduce any new land uses not already occurring within the boundaries of the Airport. Improvements would be phased over a 20-year period. The project includes both airside and landside components that are prioritized with regard to improving safety and meeting FAA guidelines as well as enhancing operations. As part of the project, aircraft movement areas would be realigned and subsequently navigational aids would be modified to meet the new alignments, and terminal expansion, hangar sites maintenance and support facilities would be constructed.

Construction

Implementation of the improvements under the project may involve grading and excavation for installation of building substructures and subgrade utilities. The areas immediately around the Airport site have a history of hazardous materials use including USTs used to store aviation fuel, as discussed above under Issue 4. A review of environmental databases for the area revealed sites that have had a known release of hazardous materials to the subsurface. These sites are in varying stages of characterization and remediation. Some clean-up activities have been completed to the satisfaction of the overseeing agency; however, there is a potential for earthwork activities to encounter previously unidentified contamination or even undocumented USTs. Disturbed contaminated soil could expose construction workers and the public to contaminants causing various short-term health effects such as nausea, vomiting, headache, dizziness, or burns. This would result in a potentially significant impact.

Construction activities would require certain hazardous materials (fuels, adhesives, solvents), that, if improperly used and inadvertently released, could result in a temporary hazard to workers or the public. Spills of hazardous materials on construction sites are typically localized and are cleaned up

in a timely manner. In most cases, the individual construction contractors are responsible for their hazardous materials and are required under their contract to properly store and dispose of these materials in compliance with state and federal laws. Given the quantities of hazardous materials typically needed for large construction projects and the use of BMPs as required by the General Construction National Pollutant Discharge Elimination System permit (see further discussion in Section 5.7, Hydrology and Water Quality), the threat of exposure to the public or contamination to soil and groundwater from construction-related hazardous materials is not considered to be significant.

Implementation of the project could also include demolition of existing structures. Disturbance of construction materials could expose construction workers, the public, or the physical environment to adverse health conditions due to the presence of hazardous materials such as asbestos and LBP. The potential for ACMs and LBP existing at the Airport site is considered to be likely due to the age of the structures on the site. Compliance with local, state, and federal regulations regarding the handling and disposal of these hazardous substances is considered adequate to reduce potential impacts to less than significant levels. See Section 5.1, *Air Quality*, for further discussion of ACMs and LBP.

Operation

Implementation of the project and operation of the Airport would continue to include the transport, storage and usage of hazardous materials including aviation fuel and associated oils and lubricants for refueling and maintenance necessary for various aircraft. If not handled appropriately, unauthorized releases could result in exposure to the public or environment resulting in adverse effects. Operation and maintenance related uses that may use hazardous materials such as petroleum products, cleaners, and solvents on a routine basis are not anticipated to change from existing conditions. Similar to existing conditions, the storage of hazardous materials and disposal of hazardous wastes are subject to the provisions of several regulatory agencies.

To receive certification as a Part 139 Airport from the FAA, an Airport Certification Manual must be prepared and regularly updated. To complete the certification process, a HMBP must be prepared and submitted to the DTSC for approval (e.g., the California Hazardous Waste Control Law [California H&SC, Division 20, Chapter 6.5], and the Hazardous Waste Control Regulations [CCR, Title 22, Division 4.5]). The goal of a HMBP is to protect both human and environmental health from adverse effects as a result of the storage or possible release of those materials. The HMBP specifies the types, quantities, applications, emergency response procedures and contingency plan (spill response) measures for the hazardous materials used during operation of the facility. The adherence to these regulations would make the potential impact of the use of hazardous materials during operation of the Airport less than significant.

5.6.4.7 Aircraft Hazards

Would implementation of the proposed project result in a safety hazard for people residing or working in a designated airport influence area?

MYF has a designated AIA, which is shown on Figure 2-14 of this PEIR. Implementation of the project would not result in an increase in aircraft activity at MYF that would result in new safety hazards for

people residing or working within the AIA, outside of the Airport. Improvements proposed under the AMP, specifically removal of the displaced threshold and reconfiguration of the taxiways, would improve operating conditions in a manner that would reduce aircraft-related safety hazards. In addition, future discretionary projects located within the AIA for MYF would be submitted to the ALUC for a consistency determination to ensure public safety is maintained.

New facilities proposed at MYF under the project, including reconfigured taxiways, additional hangar sites, additional tie-downs, a new wash rack, and new support structures and facilities, would be consistent with existing land uses at the Airport and would not result in safety hazards for people present at the Airport during operations. During construction, temporary construction workers may be exposed to aircraft-related hazards, specifically when present within MYF's Airport Operating Area (AOA), which includes the portions of the Airport used for landing, takeoff, and surface maneuvering. However, for construction activities occurring within the AOA, an FAA-approved Construction Safety and Phasing Plan (CSPP) would be implemented. Per FAA requirements, the CSPP would include, but not be limited to, description/identification of the following: coordination efforts; construction phasing; areas and operations affected by construction; NAVAID facilities affected by construction; contractor access locations and restrictions; wildlife management; foreign object debris management; hazardous materials management procedures; notification of construction activities; inspection requirements; underground utilities to be located and protected; runway and taxiway visual aids; marking and signs for access routes; hazard marking and lighting; work zone lighting for nighttime construction; protection of runway and taxiway safety areas; and other limitations on construction. Based on compliance with the regulatory requirement, the project would not result in a significant safety hazard for temporary construction workers at the Airport. Impacts would, therefore, be less than significant.

5.6.5 Significance of Impacts

5.6.5.1 Wildland Fire Risk

Although portions of the AMP area and adjacent areas are designated as VHFHSZs, future development would be subject to regulatory requirements related to fire hazards and prevention. Moreover, the project would not introduce any new land uses not already operating onsite, thereby creating a new wildland fire impact. Therefore, impacts associated with wildfire risk would be less than significant.

5.6.5.2 Hazardous Emissions and Materials in Proximity to Schools

While there are numerous schools within one-quarter mile of the AMP area, the use of typical (i.e., non-acute) hazardous materials during construction and operation would not represent a substantial risk to schools. Impacts would therefore be less than significant.

5.6.5.3 Emergency Response Plans

Implementation of the project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts would be less than significant.

5.6.5.4 Hazardous Materials Sites

Future development under the project would be required to adhere to applicable regulatory/industry codes, standards, and requirements related to health hazards from hazardous materials sites. This includes obtaining clearance from the regulatory agencies for remediation efforts at applicable locations, including the listed sites within and adjacent to the AMP area. However, although compliance with existing regulations would minimize impacts associated with hazardous materials, impacts remain potentially significant due to the potential exposure to construction workers and the public during implementation of the project.

5.6.5.5 Areas of Potential Environmental Concern

Due to the areas of potential environmental concern identified in the Hazardous Materials Technical Report, impacts remain potentially significant due to the potential exposure to construction workers and the public during implementation of the project.

5.6.5.6 Upset or Accidental Release

Due to the areas of potential environmental concern identified within the AMP area, there is a potential for accidental upset or release of hazardous materials during construction, and impacts would be potentially significant.

During operation, land uses associated with the project would continue to use, store, transport, and dispose of hazardous materials and wastes. Required adherence to the regulatory statutes reduces the impacts in relation to upset or accidental release to less than significant.

5.6.5.7 Aircraft Hazards

Through compliance with regulatory requirements, including a CSPP, the project would not result in a safety hazard for people residing or working in MYF's AIA, and impacts would be less than significant.

5.6.6 Mitigation Framework

5.6.6.1 Hazardous Materials Sites

MM HAZ-1 Construction Health and Safety Plan. For sites where contamination is suspected, including where the Hazardous Materials Technical Study (The Bodhi Group 2019) has identified a potential for contamination, the City shall prepare a health and safety plan, based on the site conditions, by a licensed industrial hygienist. The health and safety plan, in accordance with OSHA's Hazardous Waste Operations and Emergency Response Standard, shall identify potential contaminants that may be encountered, appropriate personal protective equipment, and worker safety procedures including agency notification requirements in the event that suspected contamination is encountered. Any additional investigation or remediation follow up work shall be completed by the responsible party to the satisfaction of the City of San Diego's Local Enforcement Agency or other local, state, or federal agency with

regulatory oversight for the specific hazardous condition prior to change in site use. Any identified contaminated soils shall be disposed of at a licensed waste disposal facility in accordance with local and state disposal requirements and any imported soils shall be verified as free of contamination.

MM HAZ-2 Soil Vapor Intrusion Assessment. Prior to the issuance of any building permits for locations within the AMP area where volatile contaminants have been identified in the Hazardous Materials Technical Report (The Bodhi Group 2019), an assessment of soil vapor quality shall be conducted by a qualified environmental professional. If soil vapors are found present, then a soil vapor barrier shall be incorporated into the final project design plans in accordance with local regulatory oversight unless a risk assessment study prepared by a qualified professional can demonstrate that no adverse effects would be encountered.

MM HAZ-3 Phase 1 Environmental Site Assessment. For sites that may have the potential for encountering soil impacted with ADL, LBP, or other hazardous building materials, or for properties located within groundwater basins designated for current or potential municipal beneficial uses as identified in the Hazardous Materials Technical Report (The Bodhi Group 2019), a Phase 1 Environmental Site Assessment shall be conducted to determine whether remediation is required. The City shall implement any recommendations of the Phase 1 Environmental Site Assessment, including construction monitoring of the project construction and/or remediation of the soil or groundwater to applicable regulatory standards.

5.6.6.2 Areas of Potential Environmental Concern

Implementation of mitigation measures (MM) HAZ-1, MM HAZ-2, and MM HAZ-3 would address impacts related to areas of potential environmental concern.

5.6.6.3 Upset or Accidental Release

Implementation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 would address impacts related to upset or accidental release of hazardous materials.

5.6.7 Significance of Impacts After Mitigation

5.6.7.1 Hazardous Materials Sites

Implementation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 would reduce impacts related to hazardous materials sites to a less-than-significant level.

5.6.7.2 Areas of Potential Environmental Concern

Implementation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 would reduce impacts related to areas of potential environmental concern to a less-than-significant level.

5.6.7.3 Upset or Accidental Release

Implementation of mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 would reduce impacts related to upset or accidental release of hazardous materials to a less-than-significant level.

5.7 Hydrology and Water Quality

This section of the PEIR addresses potential impacts related to hydrology and surface and groundwater quality that could result from implementation of the project.

5.7.1 Existing Conditions

The existing environmental setting, which includes a description of existing conditions relative to drainage, floodplains, water quality, and groundwater, is contained in Section 2.5.7 of this PEIR. Section 4.7 of this PEIR includes a summary of the regulatory framework relative to hydrology and water quality.

5.7.2 Methodology and Assumptions

Potential impacts resulting from implementation of the proposed project were evaluated based on relevant information from the RWQCB and Chapter 4 of the AMP (C&S Engineers, Inc. 2019). Based on a review of relevant maps and hydrologic documentation, the analysis presents the potential for hydrology and water quality impacts to occur within the project area.

5.7.3 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds (City 2022a), which have been adapted to guide a programmatic analysis for the proposed project, a significant hydrology/water quality impact would occur if implementation of the proposed project would:

1. Result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff;
2. Place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map which would impede or redirect flood flows;
3. Result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or
4. Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge.

5.7.4 Impact Analysis

5.7.4.1 Issue 1: Flooding and Drainage Patterns

Would the proposed project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?

Proposed improvements under the project would involve the demolition of impervious surfaces at multiple taxiway and runway locations and the construction of impervious surfaces in the southwestern portion of the AMP area in association with the proposed hangars. Currently, large areas within the southwestern portion of the AMP area that are proposed for development of the hangars contain undeveloped non-native grassland. Stormwater in these areas is generally retained on-site due to the presence of pervious soils and vegetation. Construction of impervious surfaces in these areas would alter the drainage pattern and increase the rate and amount of surface runoff above existing conditions, which could result in flooding.

Individual developments implemented under the proposed project would be required to adhere to NPDES requirements to control direct stormwater discharges, and to the City's Storm Water Standards Manual. The Storm Water Standards Manual contains requirements that dictate design elements in development and redevelopment projects to retain stormwater on-site and limit runoff. The Storm Water Standards Manual also includes Hydromodification Management Plan (HMP) requirements, which include design elements to limit storm water runoff discharge rates and durations, specifically in locations where downstream channels are susceptible to erosion.

Development in the City is subject to drainage regulations contained in SDMC Chapter 14, Article 2, Division 2, Storm Water Runoff and Drainage Regulations, which requires that the existing flows of a property proposed for development are maintained to ensure that the existing structures and systems handling the flows are sufficient. Since future development under the proposed project would be required to adhere to applicable drainage regulations, implementation of the proposed project would not result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff. Impacts related to flooding from surface runoff would be less than significant.

5.7.4.2 Issue 2: Flood Hazard Areas

Would the proposed project place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map which would impede or redirect flood flows?

According to the FEMA maps (map references 06073C1610G and 06073C1617G), the Airport and land surrounding its border is within Zone X (areas determined by FEMA to be outside the 0.2 percent annual chance floodplain [FEMA 2012]). The nearest floodplain is associated with Murray Canyon Creek situated to the southwest (south of Aero Drive) and an area along Murphy Canyon Road associated with Murphy Canyon Creek. As such, future development under the proposed project would not impede or redirect flood flows. Impacts related to flood hazard areas would be less than significant.

5.7.4.3 Issue 3: Water Quality

Would the proposed project result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

Future development projects in accordance with the proposed project would have the potential to change pollutant discharges either from an increase in the volume of stormwater runoff due to an

increase in impervious surfaces or from additional new sources of pollution. Construction and operation of future development would comply with applicable permits and incorporate required BMPs. This would limit runoff and potential pollutants associated with construction and airport operations, such as sediment, trash and debris, fuels, solvents, oils, lubricants, cleaners, and paints. Individual future development projects greater than one acre in area, or that are less than one acre but are part of a larger common plan of development, would be subject to the requirements of the Construction General Permit, which would require the implementation of a SWPPP and associated BMPs to be used during and after construction to prevent the discharge of sediment and other pollutants in stormwater runoff from the AMP area. Similarly, projects less than one acre in size, and not part of a larger common plan of development, would incorporate a WPCP, which would identify pollution prevention measures. During operation, numerous airport facilities at the AMP area would implement BMPs required by the Industrial General Permit (General Permit) for stormwater discharges.

Under current storm water regulations in the City, including the Storm Water Standards Manual and the Jurisdictional Runoff Management Plan, future development under the project requiring approvals would be subject to certain minimum stormwater requirements to protect water quality. Types of stormwater BMPs required for new developments include site design, source control, and treatment control BMPs. Stormwater BMPs would reduce the amount of pollutants transported from a future development project to receiving waters. Compliance with requirements set forth under the Storm Water Standards Manual and Jurisdictional Runoff Management Plan would also allow projects to be in compliance with the most current MS4 Permit, which implements a regional strategy for water quality and related concerns. Therefore, impacts related to water quality would be less than significant.

5.7.4.4 Issue 4: Groundwater

Would the proposed project deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?

The proposed project does not include developments that would result in the direct use of groundwater; therefore, implementation of the project would not deplete groundwater supplies. In addition, according to the Water Quality Control Plan for the San Diego Basin (California RWQCB 1994 as amended through 2021), most of the groundwater in the region has been extensively developed and the availability of potential future uses of groundwater resources is limited. Further development of groundwater resources would most likely necessitate groundwater recharge programs to maintain adequate groundwater table elevations.

The project would result in an increase in impervious surfaces on site, which may interfere with groundwater recharge. However, current stormwater regulations encourage infiltration of stormwater and protection of water quality, allowing for groundwater recharge protecting the quality of groundwater. As such, it is not anticipated that the proposed project would degrade groundwater quality or interfere with groundwater recharge. Therefore, impacts related to groundwater recharge, quality, and quantity would be less than significant.

5.7.5 Significance of Impacts

5.7.5.1 Flooding and Drainage Patterns

Individual developments implemented under the proposed project would be subject to requirements of the NPDES, the City's Storm Water Standards Manual, and the SDMC Storm Water Runoff and Drainage Regulations. Therefore, although implementation of the project would result in an increase of impervious surfaces in the project area, it would not alter drainage patterns or increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; impacts would be less than significant.

5.7.5.2 Flood Hazard Areas

The AMP area is not mapped as a 100-year flood hazard area (FEMA 2012) and the project would therefore not place structures in a flood hazard area. Impacts would be less than significant.

5.7.5.3 Water Quality

Construction of future development projects in accordance with the proposed project would be subject to applicable requirements, including either a General Construction Permit or WPCP, which would address the potential for the transport of pollutants in runoff water. Future specific projects would also be subject to the requirements of the Storm Water Standards Manual, Jurisdictional Runoff Management Plan, and MS4 Permit. Therefore, provided that future projects comply with the requirements within these regulations, impacts related to water quality from implementation of the proposed project would be less than significant.

5.7.5.4 Groundwater

The project would not result in the direct use of groundwater. Individual developments proposed by the project would be subject to stormwater regulations that encourage infiltration of stormwater and protection of water quality. As such, the proposed project is not anticipated to deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge; therefore, impacts would be less than significant.

5.7.6 Mitigation Framework

Implementation of the proposed project would result in less than significant impacts to hydrology and water quality. No mitigation is required.

5.8 Land Use

This section discusses land use impacts associated with the proposed project, including consistency with applicable plans and regulations and physical community division. This section analyzes the potential that implementation of the proposed project would have indirect or secondary environmental impacts.

5.8.1 Existing Conditions

The existing environmental setting, which includes a detailed discussion and description of existing land uses surrounding the AMP area is contained in Section 2.4.8 of this PEIR and a summary of the regulatory framework relative to land use, which describes applicable land use plans, ordinances, and regulations is contained in Section 4.8 of this PEIR.

5.8.2 Methodology and Assumptions

Potential impacts resulting from implementation of the proposed project were evaluated based on consistency of the proposed project with the ALUCP, City's General Plan, LDC, MSCP SAP, Kearny Mesa Community Plan, and VPHCP. Consistency with the MSCP SAP and VPHCP is further addressed in Section 5.2, *Biological Resources*.

5.8.3 Significance Determination Thresholds

The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in environmental impacts considered significant under CEQA. Based on the City of San Diego CEQA Significance Determination Thresholds (City 2022a), which have been adapted to guide a programmatic analysis for the proposed project, impacts on land use would be significant if the proposed project would:

1. Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and, as a result, cause an indirect or secondary environmental impact;
2. Conflict with the provisions of the City's MSCP SAP or other approved local, regional, or state habitat conservation plan;
3. Result in land uses which are not compatible with an adopted ALUCP; or
4. Physically divide an established community.

5.8.4 Impact Analysis

5.8.4.1 Issue 1: Conflict with Environmental Policies of Adopted Land Use Plans

Would implementation of the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and, as a result, cause an indirect or secondary environmental impact?

City of San Diego General Plan

As discussed in Section 4.8 of this PEIR, of the 11 elements in the City of San Diego General Plan, six elements contain goals and policies that are pertinent to the project: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Public Facilities, Services, and Safety Element; (4) Conservation Element; (5) Noise Element; and (6) Historic Preservation Element. The compatibility of the project with each of these elements is discussed in further detail below.

Land Use and Community Planning Element

The City's General Plan Land Use and Community Planning Element contains two airport-related land use compatibility goals that highlight the City's priority in protecting the health, safety, and welfare of persons within an AIA as well as protecting airports from incompatible land uses that could constrain operations (see Section 4.8.3.1 of this PEIR). Consistent with these goals, two of the main objectives of the AMP as stated in Section 3.3, *Master Plan Objectives*, of this PEIR, are to implement safety improvements necessary to bring the Airport into compliance with FAA regulations and design criteria, and to maintain a balance between the Airport users and the surrounding community.

The AMP outlines a series of airside and landside improvements and modifications that would accommodate current aircraft and forecasted demands: runway modifications; taxiway reconfigurations to meet FAA compliance standard; terminal building expansion; new hangars and tie-downs; and a new unleaded AvGas fuel tank. Collectively, these improvements would provide for safer Airport-related operations as well as economic benefits by modernizing and expanding the usable spaces to meet the forecasted demand. The project would not result in increased aircraft-related noise levels to the surrounding community. In fact, implementation of the project would result in a reduction in the northwestern extent of the Airport's noise contours compared to future conditions without project implementation (see Section 5.9.4.2 for additional discussion).

Mobility Element

The purpose of the General Plan Mobility Element is to improve mobility through the development of a balanced, multi-modal transportation network. As it relates to general aviation, the Mobility Element sets forth policies that foster growth to meet transportation and economic needs both on and offsite, support public safety, law enforcement, and aviation training activities, and promote the integration with multi-modal surface transportation.

The AMP was prepared in part to define the extent, type, and schedule of development needed for MYF. Preparation of the AMP included an assessment of the existing inventory of airside, support, and landslide facilities, the preparation of demand forecasts to determine the type, size, and timing of aviation facility development, and the formulation and evaluation of alternatives to ultimately construct an update to the existing master plan that would best respond to existing and projected future needs. This is evident through a combination of proposed landslide and airside components that include new hangars, terminal building expansion, and reconfiguration and modification of runways, taxiways, and runup areas.

In addition, the objectives for the AMP are aligned with the goals set forth in City's Mobility Element. Consistent with the Mobility Element, the AMP strives to maintain a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities as well as implement safety improvements consistent with FAA regulations and design criteria.

Public Facilities, Services, and Safety Element

The focus of the Public Facilities, Services, and Safety Element is to assure the provision of adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that accompany growth. The policies within the Public Facilities, Services, and Safety Element apply to transportation improvements with additional guidance from the Mobility Element.

As discussed above, the AMP was prepared to respond to the existing and projected needs of MYF to meet both safety and design criteria but also to meet projected demand for facilities and services and promote additional economic growth. Implementation of the various components of the AMP would require financing strategies that incorporate funding from various regulatory agencies. A phasing plan has been developed based upon safety, need, and financing.

Conservation Element

The General Plan Conservation Element provides for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life. One of the objectives of the project is to preserve natural resources within airport lands. As discussed in Section 5.2, *Biological Resources*, of this PEIR, the project would result in potentially significant impacts on sensitive plant and wildlife species, sensitive habitats, and vernal pools; however, mitigation measures MM BIO-1 through MM BIO-8 and MM BIO-10 would reduce these impacts to less-than-significant levels. The project would also involve the development of incompatible uses with the MHPA, and would therefore conflict with the VPHCP and MSCP SAP. Because it cannot be guaranteed at this point in the planning process whether a BLA would be approved by the Wildlife Agencies in accordance with MM BIO-9, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

Noise Element

The purpose of the General Plan Noise Element is to protect people living and working in the City from excessive noise. The General Plan Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect

people living and working in the City from an excessive noise environment. Section 4.9 of this PEIR contains a list of the goals and policies as they relate to airport noise and noise in general. Largely, the policies as they apply to the project are related to the appropriate siting of land uses in relation to noise contours included in the ALUCP.

As discussed in Section 5.9, *Noise*, implementation of the project is not anticipated to result in land use/noise incompatibilities between the Airport and surrounding land uses.

Historic Preservation Element

The purpose of the General Plan Historic Preservation Element is also to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.

General Plan Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans. These policies also focus on coordinated planning and preservation of tribal resources, promoting the relationship with Kumeyaay/Diegueño tribes. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through cultural heritage tourism.

Impacts associated with historical, archaeological, and tribal cultural resources are discussed in Section 5.5, *Historical, Archaeological, and Tribal Cultural Resources*, of this PEIR. Implementation of mitigation measures MM HIST-1, MM HIST-2, and HIST-3 would ensure that implementation of the proposed project would be consistent with the Historic Preservation Element.

Summary

The proposed project would generally be consistent with and support the goals and policies identified in the General Plan. Implementation of mitigation measures MM BIO-1 through MM BIO-8, MM BIO-10, and MM HIST-1 through MM HIST-3 would ensure that impacts associated with land use consistency with applicable plans would be less than significant.

Land Development Code Regulations

As discussed in Chapter 4.0, *Regulatory Framework*, the LDC contains Citywide base zones that specify permitted land uses, densities, FARs, and other development requirements for given zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements.

Environmentally Sensitive Lands Regulations

As discussed in Section 5.2, *Biological Resources*, of this PEIR, ESLs include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the requirements of the City's

Biology Guidelines (2018) as outlined in the SDMC ESL Regulations (Chapter 14, Article 3, Division 1).

Implementation of future improvements associated with the project would result in approximately 0.54 acre of impacts to wetlands (vernal pools), which are considered ESLs. The City Biology Guidelines (City 2018) state that impacts to wetlands can be approved but require a deviation from ESL Regulations. Outside the Coastal Overlay Zone, requests to deviate from the ESL wetland regulations may be considered only if the proposed development falls within one of the three options as defined by City of San Diego LDC Section 143.0510 (d): (1) Essential Public Projects Option, (2) Economic Viability Option, or (3) Biologically Superior Option.

Per Section 8.4.3 of the VPHCP, wetland deviation is not required for wetland impacts outside the MHPA, thus, the 0.29 acre of vernal pool impacts outside the MHPA do not require a deviation. A wetland deviation is required only for the 0.25 acre of vernal pool impacts within the MHPA, of which 0.18 acre is permanent impact and 0.07 acre is temporary impact.

The project falls under the Essential Public Projects (EPP) deviation option. Deviation from ESL regulations on wetlands impacts under the EPP option must include a project design “where no feasible alternative exists that would avoid impacts to wetlands.” Further, project classification as an EPP shall include one of the following four criteria: (1) be identified in an adopted land use plan or implementing document and identified on the EPP List adopted by Resolution No. [R-311507] as Appendix III to the City Biology Guidelines, or (2) be linear infrastructure, including but not limited to major roads and land use plan circulation element roads and facilities, or (3) be maintenance of existing public infrastructure, or (4) be a state or federally mandated project.

Impacts to 0.25 acre (0.18 acre permanent impact and 0.07 acre temporary impact) of wetlands (vernal pools) within the MHPA that would result from the project are associated with construction of additional pavement for the new hold bay at Taxiway A (impacts to a 0.029-acre vernal pool, composed of 0.004 acre of direct impact and 0.025 indirect impact considered a permanent impact herein) and installation of MALSR lighting (0.021 acre of vernal pool impact). It should be noted that for partial impacts to vernal pools the entire pool was considered impacted, although the actual project footprint of each project is much smaller. The project would implement partial demolition of the existing hold bay, and new pavement would be constructed to expand the runup area and bring the taxiway geometry to current FAA design criteria and to increase hold bay capacity. The proposed hold bay would improve the safety of the airfield by allowing aircraft to bypass other aircraft that are performing run-ups or waiting for clearance from air traffic control. As previously discussed, MALSR lighting is an approach lighting system that assists aircraft with runway alignment during landing and is required by the FAA for airport safety. No other project components would impact City wetlands within the MHPA.

The proposed hold bay at Taxiway A is mandated by the FAA as this location has been identified as an area of high incidence of runway incursions at MYF, and MALSR lighting is FAA-mandated safety lighting, thus meeting the definition of a federally mandated project, and falling under the EPP option for wetland deviation.

Historical Resources Regulations

The Historical Resources Regulations (Section 143.0213(a) of the LDC) apply when historical resources are present. As defined by the Historical Resources Regulations, historical resources

include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. As discussed in Section 5.5, *Historical, Archaeological and Tribal Cultural Resources*, implementation of the project would have the potential to affect historic resources. Implementation of mitigation measures MM HIST-1, MM HIST-2, and HIST-3 would ensure that improvements associated with the project would be consistent with the City's Historical Resources Regulations.

Climate Action Plan

In December 2015, the City adopted its CAP. The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. On August 2, 2022, the City Council adopted an update to the CAP (2022 CAP). As proposed in the 2022 CAP, in October 2022, the City Council approved an amendment to the LDC (SDMC Chapter 14, Article 3, Division 14), which established the CAP Consistency Regulations. The CAP Consistency Regulations replaced the CAP Consistency Checklist as the measures that could be implemented on a project-by-project basis pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Projects for new development that are consistent with the CAP, as determined through compliance with the CAP Consistency Regulations, may rely on the CAP for the cumulative impact analysis of GHG emissions (City 2022b). As discussed in Section 5.4, *Greenhouse Gases*, with implementation of mitigation measures MM GHG-1 and MM GHG-2, the project would not conflict with or create inconsistencies with the CAP.

Kearny Mesa Community Plan

MYF lies within the planning boundaries of the Kearny Mesa Community Plan (City 2020c). The Kearny Mesa Community Plan contains the following policies related to MYF:

- **Policy 1.26:** Ensure that future uses, building intensity, residential density, and heights are compatible with the safety zones, noise contours, and airspace protection surfaces identified in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for Montgomery-Gibbs Executive Airport and MCAS Miramar.
- **Policy 1.27:** Review development for consistency with adopted airport policies, such as those set forth in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for Montgomery-Gibbs Executive Airport and MCAS Miramar.
- **Policy 4.20:** Coordinate with the Montgomery-Gibbs Executive Airport and/or other adjacent property owners on the implementation of the urban pathways comprised of a combination of pedestrian walkways, bike lanes, multi-use paths, linear parks and/or trails for the Airport Loop, Aero Promenade, Opportunity Trails, and Park Link.
- **Policy 6.8:** Coordinate with property owners and agencies to provide a future park that extends the airport viewing area along Kearny Villa Road to Balboa Avenue.
- **Policy 6.29:** Work cooperatively with property owners to preserve and manage vernal pools in accordance with the VPHCP.

As discussed below under Section 5.8.4.3, the purpose of AMPs is to assess the demand for airport facilities and to guide the development necessary to meet those demands. In contrast, the major

purpose of a compatibility plan is to ensure that incompatible development does not occur on land surrounding the airports. Specifically, the ALUCP is to provide land use measures that ensure the safety and welfare of the public is protected from excessive noise and safety hazards associated with aviation by discouraging incompatible development in areas surrounding airports.

The current ALUCP is based on the ALP most recently approved by the FAA. Changes to the ALP occurring as a result of the AMP process will be reviewed by the SDCRAA, acting as the designated ALUC for all airports within San Diego County, to determine potential impacts to the ALUCP. When reviewing AMPs for existing airports, the ALUC has three action choices:

- Find the AMP consistent with the Comprehensive Airport Land Use Plan.
- Disapprove the AMP on the basis that it is inconsistent with the ALUC's Plan.
- Modify the Comprehensive Airport Land Use Plan (after duly noticed public hearing) to reflect the assumptions and proposals in the AMP.

Thus, through this ALUC review process, either it is determined that the AMP is consistent with the ALUCP or modifications to either the AMP or the ALUCP would be required to assure consistency between the two plans.

Moreover, the AMP is a continuation of the existing pattern of development at MYF and is in part designed to respond to anticipated future demand and in part to adhere to FAA design and safety regulations. In responding to anticipated future demands, it was determined that there would be deficiencies such as the amount of aircraft parking and terminal space. Through a combination of improvements proposed under the AMP, MYF would continue to be a community and regional asset. The project would therefore not conflict with Policies 1.26 or 1.27.

Development associated with the project would occur entirely within the AMP area. As such, the project does not propose improvements associated with public urban pathways; however, the project does not involve improvements related to public roadways that would preclude the development of such facilities, including those associated with the Airport Loop. The project would therefore not conflict with Policy 4.20.

The project proposes the development of a public viewing area along Kearny Villa Road, which would directly contribute to achieving Policy 6.8.

Lastly, in relation to the project's impact on vernal pools, as discussed in Section 5.2 of this PEIR, the project would impact 0.54 acre of vernal pools. Mitigation for this impact is consistent with the Mitigation Framework described in the City's VPHCP (see Mitigation Measure BIO-8). Impacts are reduced to less than significant.

The VPHCP outlines a process for MYF to impact vernal pools and VPHCP-covered species on the Airport property. Minor amendments allow impacts to vernal pool habitats and/or species within the boundary of the airport property. Impacts to vernal pool habitat and VPHCP covered species may be approved when it is necessary to meet the health and safety requirements of the airport. A minor amendment would be prepared, if required, prior to individual AMP improvement implementation.

Changes such as BLAs or other airport actions may be considered for a minor amendment. A minor

amendment is granted by the wildlife agencies (USFWS Field Office Supervisor and CDFW's Natural Community Conservation Planning Program Manager) after a consistency determination with the VPHCP. If the minor amendment is approved, the wildlife agencies will provide a Letter of Concurrence. If the minor amendment is not approved and the AMP is determined to be not in conformance, the project would not be able to rely on take coverage provided by the VPHCP.

Thus, through the review process and the implementation of the mitigation, the project would be consistent with the policies regarding airport operations in the Kearny Mesa Community Plan.

5.8.4.2 Issue 2: Consistency with the Multiple Species Conservation Program Subarea Plan and Vernal Pool Habitat Conservation Plan

Would the proposed project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

Multiple Species Conservation Program Subarea Plan

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through SAPs, which describe specific implementing mechanisms. Likewise, the City's VPHCP was prepared to provide an effective framework to protect, enhance, and restore vernal pool resources in specific areas within the City's jurisdiction.

The airport contains areas mapped as MHPA under the City's MSCP SAP. A total of 197.8 acres of MHPA currently exist on the Airport property and primary consist of Diegan coastal sage scrub, non-native grassland, Baccharis scrub, vernal pool, and disturbed habitat, and developed land (refer to Figure 5.2-1).

Land uses deemed compatible with the goal and objectives of the MSCP are allowed within the MHPA. Such uses include passive recreation, utility lines and roads, limited water facilities and other essential public facilities, limited low density housing, Brush Management Zone 2, and limited agriculture.

Project components within the MHPA include the installation of MALSR lighting in the southeastern portion of the site. MALSR lighting is an approach lighting system that assists aircraft with runway alignment during landing and is required for airport safety. The majority of the proposed MALSR lighting, as well as access to install the lighting, would occur along existing roads which are maintained as a covered airport activity under the VPHCP. However, due to FAA spacing requirements for the MALSR lighting, some lighting and associated access roads will require construction outside of the existing road network, resulting in new impacts within the MHPA. The installation of MALSR lighting and associated access roads are land uses that are compatible and consistent with Section 1.4.1 of the MSCP SAP.

Other project components proposed within the MHPA are adjacent to Taxiway A for the new hold bay. These are not compatible land uses within the MHPA. These improvements for the new hold bay at Taxiway A would be required to meet current FAA design standards. These improvements would result in 0.18 acre of temporary impacts and 0.33 acre of permanent impacts within the

MHPA. These areas are adjacent to existing Taxiway A. Disturbed habitat comprises most of this area, although non-native grassland, Diegan coastal sage scrub, and vernal pool also are present in the MHPA impact area.

In accordance with MM BIO-9, a BLA may be required to remove this small portion of the MHPA in the project development area that is proposed for development. As part of the BLA, an area of equivalent or higher biological value would be added adjacent to the current MHPA boundary. The MHPA on site currently exists primarily on the western, northern, and eastern portions of the AMP area. The central and southern portions of the AMP area are largely outside of the MHPA.

In order for a BLA to be approved, six findings must be made in accordance with Section 5.4.2 of the MSCP and Section 1.1.1 of the MSCP SAP (County 1998 and City 1997, respectively; refer to Section 5.2.4.5 of this PEIR). In addition, to complete a BLA the project proponent must have concurrence from the Wildlife Agencies.

Because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

Vernal Pool Habitat Conservation Plan

The City of San Diego VPHCP (City 2019) was prepared to provide an effective framework to protect, enhance, and restore vernal pool resources in specific areas within the City's jurisdiction. Section 4.2.7 of the VPHCP (City 2019) includes discussion of MYF. Federal aviation regulations require the airport be maintained and operated in a manner that promotes the health, safety, and welfare of airport users, and the surrounding community. The following are covered airport activities in the VPHCP: maintenance and inspections of all existing safety areas, runway protection zones, critical areas, infields, runway and taxi shoulders, and storm water conveyances; maintenance, access, inspections, and operation of all existing equipment and infrastructure for public safety and normal airport operations; CIP rehabilitation and/or maintenance of existing airport infrastructure; and maintenance and inspection of exiting public right of way access.

The project proposes construction of MALSRL lighting within the MHPA and access to some of the lighting would be via existing roads. Use and maintenance of these existing roads is a covered airport activity. However, installation of MALSRL lighting also would require construction of short reaches of new access road within the MHPA; these new access roads are not a covered activity under the VPHCP but are a compatible land use within the MHPA (as discussed above). In addition, future projects implemented by the project would implement the avoidance and minimization measures identified in Section 5.2.1 of the City's VPHCP.

5.8.4.3 Issue 3: Consistency with Adopted Airport Land Use Compatibility Plans

Would the proposed project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan?

The ACLUP is distinct from the AMP in function and content. In simple terms, the issues addressed by AMPs are primarily on-airport, whereas those of concern in compatibility plans are generally off-

airport. The purpose of AMPs is to assess the demand for airport facilities and to guide the development necessary to meet those demands. In contrast, the major purpose of a compatibility plan is to ensure that incompatible development does not occur on land surrounding the airports. Specifically, the ALUCP is to provide land use measures that ensure the safety and welfare of the public is protected from excessive noise and safety hazards associated with aviation by discouraging incompatible development in areas surrounding airports.

As stated in Section 3.3, *Master Plan Objectives*, of this PEIR, the intent of the AMP in part is to implement safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria. In doing such, improvements and modifications to the existing runways and taxiways are proposed as part of the project.

The current MYF ALUCP is based on the ALP most recently approved by the FAA. Changes to the ALP occurring as a result of the AMP would be reviewed by the ALUC to determine potential impacts to the ALUCP. Modifications to the runways and taxiways as well as other facilities would require an update to the ALUCP for changes in noise contours, safety zones, and/or land use type or density policies within the ALUC jurisdiction for MYF. Processing an update to the ACLUP would ensure consistency and reduce levels to less than significant.

5.8.4.4 Issue 4: Community Division

Would implementation of the proposed project physically divide an established community?

Implementation of the proposed project includes both landside and airside improvements and modifications that lie within the boundaries of MYF. Project implementation would not include acquisition of additional property and does not propose the introduction of new uses that are different or inconsistent from the existing uses in the area. Thus, the project would not divide an established community.

5.8.5 Significance of Impacts

5.8.5.1 Conflict with Environmental Policies of Adopted Land Use Plans

With the inclusion of mitigation measures MM BIO-1 through MM BIO-8, MM BIO-10, and MM HIST-1 through MM HIST-3, the project's impacts in relation to consistency with applicable land uses plans is reduced to less than significant.

5.8.5.2 Consistency with the MSCP Subarea Plan and VPHCP

The AMP would involve the development of incompatible uses with the MHPA, and would therefore conflict with the VPHCP and MSCP SAP. Impacts are considered significant.

5.8.5.3 Consistency with Adopted Airport Land Use Compatibility Plans

Changes to the ALP occurring as a result of the AMP would be reviewed by the ALUC to determine potential impacts to the ALUCP. Modifications to the runways and taxiways as well as other facilities would require an update to the ALUCP for changes in noise contours, safety zones, and/or land use

type or density policies within the ALUC jurisdiction for MYF. Processing an update to the ACLUP would ensure consistency and reduce levels to less than significant.

5.8.5.4 Community Division

The airside and landside improvements and modifications proposed as part of the project would occur within the existing boundaries of MYF. Land uses compatible with the guidelines of the AIA would continue to be acceptable and the project would not affect any current operations within the AIA. The project would not physically divide an established community; no impact would occur, and no mitigation is required.

5.8.6 Mitigation Framework

No new mitigation is required beyond those already identified for biological resources (MM BIO-1 through MM BIO-10) and historical resources (MM HIST-1 through MM HIST-3).

5.8.7 Significance of Impacts After Mitigation

5.8.7.1 Consistency with the MSCP Subarea Plan and VPHCP

Because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies in accordance with MM BIO-9, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

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5.9 Noise

This section of the PEIR addresses potential noise and vibration impacts that would result from implementation of the proposed project. The analysis in this section is based, in part, on the *Montgomery-Gibbs Executive Airport Master Plan Update Construction Noise Impact Report* (HELIX 2025e) and the *Airport Master Plan Study for Montgomery-Gibbs Executive Airport – 2037 Forecast Noise and Air Quality Modeling Assumptions Technical Memorandum* (HMMH 2019), which are included as Appendices I and C, respectively.

5.9.1 Existing Conditions

The existing environmental setting, which includes a discussion of the existing noise environment in the vicinity of the AMP area, is contained in Section 2.5.9 of this PEIR. As indicated in that section, the primary noise generators in the vicinity of the AMP area include freeways (I-805, I-15, and SR 163), major roadways, and aircraft operations at MYF. Section 4.9 of this PEIR includes a summary of the regulatory framework relative to noise.

5.9.2 Methodology and Assumptions

5.9.2.1 Vehicular Traffic Noise

Vehicles traveling along major local roadways and freeways generate noise levels that affect adjacent land uses. Traffic noise generated on a roadway is dependent on vehicle speed, volume, flow, percentage of vehicle types, properly functioning muffler systems, and pavement type and conditions. Traffic noise is also dependent on the presence of barriers and the distance between the noise source and the receptor. In general, as traffic volumes increase, noise levels increase. This condition exists until there is so much traffic that flow degrades, and speeds decrease, which reduces noise levels. Furthermore, a heavy truck generates more noise than a car when travelling at the same speed and distance. Roads with the same amount of traffic can have higher or lower sound levels depending on the mixture of vehicles.

Trip generation for the proposed project was estimated by first determining trip generation per flight based on existing airport operations. This rate was then multiplied by the total projected number of flights under the buildout of the project. The increased number of flights is forecasted to generate 141 daily unadjusted driveway vehicle trips. In addition, it is assumed that the public viewing area would generate 10 daily trips, resulting in a total of 151 daily unadjusted driveway vehicle trips associated with implementation of the project under future year 2037 conditions (CR Associates 2025). Data from SANDAG's Transportation Forecast Information Center was used for non-AMP traffic volumes on roadways in the AMP area.

5.9.2.2 Aircraft Noise

Future (2037) aircraft noise under the no project scenario and under buildout of the project was estimated by HMMH (2019) using the FAA's AEDT. AEDT incorporates specific noise and performance data for each aircraft type operating at the airport. Noise data is in the form of Sound Exposure Level at a range of distances (from 200 feet to 25,000 feet) from a particular aircraft with engines at

a range of thrust levels. Performance data includes thrust, speed, and altitude profiles for takeoff and landing operations.

Noise was estimated for the 2037 forecast conditions at MYF with and without the AMP update, incorporating aircraft operations, runway utilization, flight geometry and use, meteorological conditions, and terrain data. Refer to Appendix C for additional details on the aircraft noise assessment methodology.

5.9.2.3 Stationary Noise

Stationary sources of noise include activities associated with a given land use. The project includes various stationary noise sources associated with airport operations and support facilities. Noise levels from stationary sources are highly localized and may vary during the day based on the specific activity being performed, atmospheric conditions, and other factors. Stationary noise is considered a “point source” and generally attenuates over distance at a rate of 6 dBA for each doubling of distance.

5.9.2.4 Construction Noise

Although typically short-term, construction can be a substantial source of noise. The primary noise source is the operation of heavy off-road diesel-powered construction equipment. Table 5.9-1, *Construction Equipment Assumptions*, includes individual construction phases and the assumed list of construction equipment for each phase. The exact equipment types are not known at this point in project planning. For the purposes of this analysis, noise levels of typical equipment types are used.

**Table 5.9-1
CONSTRUCTION EQUIPMENT ASSUMPTIONS**

Phase	Equipment	Use per hour (percent)	Noise Level at 50 feet (one hour dBA L _{EQ})
<i>Pavement Construction</i>			
Grooving	Grooving machine	40	81.0
	Tank truck	40	72.5
	Sweeper/scrubber	40	81.0
Marking	Blasting truck	40	81.0
	Marking machine	10	66.1
Preventative Maintenance and Rehabilitation	Crack sealing truck	40	72.5
	Concrete saw	20	82.6
	Tractor/loader/backhoe	40	75.1
	Paving equipment	50	74.2
	Roller	20	78.0
Existing Surface Reconstruction	Pavement milling machine	10	66.1
	Paving machine	50	74.8
	Paving equipment	50	74.8
	Roller	20	78.0
New Surface Construction	Rubber-tired dozer	40	77.7
	Grader	40	81.0
	Rubber-tired loader	40	75.1

Phase	Equipment	Use per hour (percent)	Noise Level at 50 feet (one hour dBA L _{EQ})
New Surface Construction (cont.)	Paving machine	50	74.8
	Paving equipment	50	74.8
	Roller	20	78.0
Pavement Demolition	Concrete saw	20	82.6
	Rubber-tired dozer	40	77.7
	Excavator	40	76.7
	Rubber-tired loader	40	75.1
	Crushing machine	50	83.5
	Impact hammer/ breaker	40	83.0
<i>Hangar/Building Construction</i>			
Hangar/Building Construction	Rubber-tired dozer	40	77.7
	Tractor/loader/backhoe	40	75.1
	Crane	16	72.6
	Forklift/Aerial Lift	20	68.0
	Welder	40	69.0
	Generator	50	79.0

dBA = A-weighted decibels; L_{EQ} = time-averaged noise level

5.9.2.5 Vibration

Potential sources of vibration from implementation of the project would be associated with construction activities. Construction activities known to generate substantial levels of vibration include the use of vibratory rollers and pile driving.

5.9.3 Significance Determination Thresholds

Thresholds used to evaluate potential noise impacts are based on applicable criteria in the State CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (City 2022a). Thresholds have been modified from the City's CEQA Significance Determination Thresholds to reflect a programmatic analysis for the proposed project. A significant noise impact could occur if the implementation of the proposed project would:

1. Result in or create a significant increase in the existing ambient noise levels;
2. Result in an exposure of people to current or future transportation noise levels which exceed guidelines established in the Noise Element of the General Plan;
3. Result in land uses which are not compatible with aircraft noise levels as defined by an adopted ALUCP;
4. Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code;
5. Result in the exposure of people to significant temporary construction noise; or

6. Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

Thresholds used to determine the significance of noise impacts are based on standards in the General Plan Noise Element and the Noise Abatement and Control Ordinance (Section 59.5.0101 et seq. of SDMC) as described in Section 4.9.3 of this PEIR.

For aircraft-generated noise, project impacts are compared against the future buildout of the Airport (2037) to determine the change due to the project compared to changes in future aircraft operations that would occur without the project.

While the City has not established vibration and groundborne noise standards, Caltrans' Transportation and Construction Vibration Guidance Manual (Caltrans 2020) provides guidance for the analysis of environmental impacts due to groundborne noise and vibration relating to transportation and construction projects. A significant vibration impact would occur where structures or human receivers would be exposed to the respective damage and annoyance thresholds, measured in PPV, listed in Table 5.9-2, *Maximum Vibration Levels for Construction Equipment for Potential Damage and Annoyance*, below.

Table 5.9-2
MAXIMUM VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT FOR
POTENTIAL DAMAGE AND ANNOYANCE
(PPV in/sec)

Structure Type	Potential Damage Thresholds		"Strongly Perceptible" Annoyance Criteria	
	Transient Sources	Continuous/Frequent Intermittent Sources	Transient Sources	Continuous/Frequent Intermittent Sources
Historic and some old buildings	0.5	0.25	0.9	0.1
Older residential structures	0.5	0.3		
New residential structures	1.0	0.5		
Modern industrial and commercial buildings	2.0	0.5		

Source: Transportation and Construction Vibration Guidance Manual, Caltrans 2020

Note: Transient sources generate a single vibratory event, such as blasting. Continuous/frequent sources include pile driving equipment and other construction activities generating multiple vibration-intensive events across a given period.

in/sec = inches per second; PPV = peak particle velocity

5.9.4 Impact Analysis

5.9.4.1 Issue 1: Ambient Noise

Would the proposed project result in or create a significant increase in the existing ambient noise levels?

The proposed project could result in a permanent increase in ambient noise levels due to on-site non-mobile operations, aircraft activity, and on-road vehicular traffic. On-site non-mobile operations would be subject to City noise standards and are discussed below under Section 5.9.4.4. Noise impacts associated with aircraft operations are discussed below under Section 5.9.4.2.

A significant impact related to roadway traffic noise could result if the project generates traffic that increases ambient noise levels by 3 dBA, which is considered a perceptible change in noise levels. A 3-dBA increase in noise levels generally requires a doubling of traffic. The project is expected to result in an increase of 151 daily vehicle trips (CR Associates 2025). These trips would primarily occur along Aero Drive. Existing daily traffic volumes along the segment of Aero Drive adjacent to the Airport exceed 15,000 vehicles (SANDAG 2025). The project's estimated daily trip generation would not result in a doubling of traffic along Aero Drive and would therefore not generate a 3-dBA increase in noise levels. Impacts associated with an increase in ambient noise levels from vehicular traffic would be less than significant.

5.9.4.2 Issue 2: Noise – Land Use Compatibility

Would the proposed project cause exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?

As noted above, vehicular noise levels from implementation of the project are not expected to substantially increase noise levels compared to existing conditions, and, therefore, would not result in exceedances of standards established in the Noise Element of the General Plan.

A comparison of the future (2037) noise contours associated with MYF both without the project and with project implementation are shown on Figure 5.9-1, *Future Montgomery-Gibbs Executive Airport Noise Contours With and Without AMP Implementation*. The future project 75 and 70 CNEL contours are generally confined to the AMP area. The future project 65 CNEL contour extends outside of the AMP area boundary to the northwest. Land uses outside the AMP area that are within the 65 CNEL contour include industrial, commercial, and office use. Industrial uses are considered compatible with noise levels up to 75 CNEL. Commercial and office uses are considered conditionally compatible with noise levels between 65 and 75 CNEL, with the requirement that interior noise levels for occupied area be attenuated to 50 CNEL. As shown in Figure 5.9-1, the project itself would not result in the exposure of these land uses to noise levels in excess of 65 CNEL. In fact, implementation of the project would result in a reduction in the northwestern extent of the 65 CNEL contour (as well as the 70 CNEL contour) compared to future conditions without project implementation. This is a result of the removal of the Runway 28R displaced threshold, which would shift aircraft landing approaches to the east. While this shift would increase the southeastern extent of the 65 CNEL contour compared to future conditions without project implementation, this extension would be within the Airport property where there are no commercial, residential, or other NSLUs. This would be consistent with General Plan Policy NE-D.5, which intends to minimize excessive aircraft noise from aircraft operating at MYF to surrounding residential areas. As such, the proposed project is not expected to cause the exposure of people to future aircraft noise levels that exceed the standards established in the Noise Element of the General Plan. Therefore, impacts associated with transportation noise levels are expected to be less than significant.

5.9.4.3 Issue 3: Aircraft Noise

Would the proposed project result in land uses which are not compatible with aircraft noise levels as defined by an adopted ALUCP?

New facilities proposed under the project include modified runways, reconfigured taxiways, an expanded terminal building, additional hangars and tie-downs, a public viewing area, a fuel tank, and other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road (specific uses to be determined). These uses would be consistent with the existing land use (airport facilities). The modified runways, reconfigured taxiways, and fuel tank would not involve human occupation and, therefore, are not subject to the noise compatibility criteria set forth in the MYF ALUCP. Similarly, since the public viewing area would be occupied voluntarily for short periods of time by people with the specific intent of viewing aircraft activity, this use is not considered subject to the noise compatibility criteria set forth in the MYF ALUCP. The terminal building, additional hangars and tie-downs, and aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road would involve regular or occasional human occupation and, therefore, are subject to the noise compatibility criteria set forth in the MYF ALUCP. Under future (2037) conditions, the terminal building and other aeronautical land uses would be located outside of the 65 CNEL contour, and the new hangars and tie-downs would be predominantly located outside of the 70 CNEL contour, with small portions extending within the 70 CNEL contour. Per the MYF ALUCP, the terminal building and other aeronautical land uses, which most closely represent commercial land uses, are compatible with noise levels up to 65 CNEL, and would thus be consistent with applicable ALUCP noise compatibility criteria. The hangars and tie-downs are compatible with noise levels up to 75 CNEL and would thus be consistent with applicable ALUCP noise compatibility criteria. As such, the proposed uses would be consistent with MYF ALUCP noise compatibility criteria, and impacts would be less than significant.

5.9.4.4 Issue 4: San Diego Municipal Code – On-Site Generated Noise

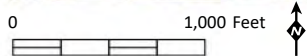
Would the proposed project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?

Components of the proposed project include modified runways, reconfigured taxiways, an expanded terminal building, additional hangars and tie-downs, a public viewing area, a fuel tank, and other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road (specific uses to be determined). Generally, these uses would either not generate noise (e.g., the reconfigured taxiways) or would not create substantial new non-mobile sources of noise in the project area, as similar uses already exist. However, since the specific uses associated with the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road are yet to be determined, there is potential that these uses could include noise sources that generate elevated noise levels at the adjacent southern property line, across from which (across Aero Drive) are parcels zoned as Residential Mixed-Use and Employment Mixed-Use. As such, there is potential that noise levels could exceed property line noise limits, and impacts are conservatively considered potentially significant.

5.9.4.5 Issue 5: Construction Noise

Would the proposed project result in the exposure of people to significant temporary construction noise?

A significant impact could occur if implementation of the proposed project would result in the exposure of people to substantial temporary construction noise. Construction activities associated with implementation of the airside and landside improvements under the proposed project would



require the use of diesel-powered off-road equipment that would generate noise. Construction of individual improvements within the project area would occur over multiple phases and would not all occur simultaneously.

Construction may involve the demolition of existing infrastructure including pavement, grading, paving, and erecting new structures. The magnitude of the impact would depend on the type of construction activity, equipment, distance between the noise source and receiver, and any intervening structures. As noted under the construction assumptions, the loudest noise generation would be from the sawing, cutting, jackhammering, crushing, and breaking for demolition of existing pavement and cement for the Airport runways and taxiways. Construction would occur elsewhere within the project area, which would generate elevated noise levels. The closest NSLUs to the construction areas are located at the Four Points by Sheraton hotel at the southwestern corner of the AMP area, and residences to the south across Aero Drive.

General Construction Noise

Each construction phase requires different equipment depending on the type of construction being performed. Assuming a noise attenuation rate of 6 dBA per doubling of distance, noise levels from the various equipment types would reduce to below the 75 dBA L_{EQ} (12 hour) threshold at different distances. Table 5.9-3, *Construction Equipment Setback Distances*, provides the distances within which noise levels would exceed City thresholds.

**Table 5.9-3
CONSTRUCTION EQUIPMENT SETBACK DISTANCES**

Phase	Equipment	Setback Distance (feet)
Grooving	Grooving machine	100
	Tank truck	38
	Sweeper/scrubber	100
Marking	Blasting truck	71
	Marking machine	18
Preventative Maintenance and Rehabilitation	Crack sealing truck	38
	Concrete saw	120
	Tractor/loader/backhoe	51
	Paving equipment	46
	Roller	71
Existing Surface Reconstruction	Pavement milling machine	18
	Paving machine	46
	Paving equipment	46
	Roller	71
New Surface Construction	Rubber-tired dozer	68
	Grader	100
	Rubber-tired loader	51
	Paving machine	46
	Paving equipment	46
	Roller	71

Phase	Equipment	Setback Distance (feet)
Pavement Demolition	Concrete saw	120
	Rubber-tired dozer	68
	Excavator	61
	Rubber-tired loader	51
	Crushing machine	133
	Impact Hammer/Breaker	126
Hangar/Building Construction	Rubber-tired dozer	68
	Tractor/loader/backhoe	51
	Crane	38
	Forklift/Aerial Lift	22
	Welder	25
	Generator	79

Source: HELIX 2025e

Note: all distances assume use during each of hour a 12-hour workday

If NSLUs are located within the setback distances listed in Table 5.9-3, impacts would be potentially significant. These distances do not assume the presence of intervening topography or structures, and therefore represent a conservative analysis based on the City noise ordinance thresholds. All distances assume the use of construction equipment for each hour of a given 12-hour workday. Noise levels would therefore be reduced if used less than 12 hours per day. Furthermore, construction equipment is mobile and may be moving across the project area throughout a given construction day.

The exact equipment types, equipment locations, and therefore exact noise levels generated by future individual projects within the project area cannot be determined at this point in the planning process. Additionally, the locations of future NSLUs may change during future construction phases and cannot be determined to be outside the setback distances described in Table 5.9-3. Therefore, calculations of noise levels at specific receptor locations are not possible at this time, and impacts are determined to be potentially significant.

Nighttime Construction Noise

The City's Noise Ordinance requires construction to occur between the hours of 7:00 a.m. and 7:00 p.m. Due to the Airport's ongoing operations during construction of individual projects, construction activities may be required outside these hours. If construction is required during nighttime hours, construction noise would be significant if it exceeds the City's one-hour sound level limits, as shown in Table 4-3 of this EIR. Table 5.9-4, *Nighttime Construction Setback Distances*, provides the distances within which noise levels would exceed the various City sound level limits for single-family residential, multi-family residential, all other residential, and commercial zones. Industrial zone sound level limits would be 75 dBA L_{EQ} (one hour), which would be equivalent to the setback distances shown in Table 5.9-3.

**Table 5.9-4
NIGHTTIME CONSTRUCTION SETBACK DISTANCES**

Equipment	Setback Distance (feet)				
	40 dBA L _{EQ} (one hour) Limit ¹	45 dBA L _{EQ} (one hour) Limit ²	50 dBA L _{EQ} (one hour) Limit ³	55 dBA L _{EQ} (one hour) Limit ⁴	60 dBA L _{EQ} (one hour) Limit ⁵
Grooving machine	3,976	2,236	1,257	707	398
Tank truck	2,113	1,189	668	376	211
Sweeper/scrubber	5,623	3,162	1,778	1,000	562
Blasting truck	3,976	2,236	1,257	707	398
Marking machine	1,009	568	319	179	101
Crack sealing truck	2,113	1,189	668	376	211
Concrete saw	6,753	3,797	2,135	1,201	675
Tractor/loader/backhoe	2,851	1,603	902	507	285
Paving equipment	2,561	1,440	810	455	256
Roller	3,976	2,236	1,257	707	398
Pavement milling machine	1,009	568	319	179	101
Rubber-tired dozer	3,846	2,163	1,216	684	385
Grader	5,623	3,162	1,778	1,000	562
Rubber-tired loader	2,851	1,603	902	507	285
Paving machine	2,561	1,440	810	455	256
Excavator	3,428	1,928	1,084	610	343
Crushing machine	7,472	4,202	2,363	1,329	747
Impact Hammer/Breaker	7,071	3,976	2,236	1,257	707
Crane	2,143	1,205	678	381	214
Welder	1,413	794	447	251	141
Generator	4,451	2,503	1,408	792	445
Forklift/Aerial Lift	1,257	707	398	224	126

¹ The 40 dBA L_{EQ} (one hour) limit applies to single-family residential zones during the hours of 10:00 p.m. to 7:00 a.m.

² The 45 dBA L_{EQ} (one hour) limit applies to single-family residential zones during the hours of 7:00 p.m. to 10:00 p.m. and the multi-family residential zones during the hours of 10:00 p.m. to 7:00 a.m.

³ The 50 dBA L_{EQ} (one hour) limit applies to multi-family residential zones during the hours of 7:00 p.m. to 10:00 p.m. and all other residential zones during the hours of 10:00 p.m. to 7:00 a.m.

⁴ The 55 dBA L_{EQ} (one hour) limit applies to all other residential zones during the hours of 7:00 p.m. to 10:00 p.m.

⁵ The 60 dBA L_{EQ} (one hour) limit applies to commercial zones during the hours of 7:00 p.m. to 7:00 p.m.

dBA = A-weighted decibels; L_{EQ} = time-averaged noise level

The exact equipment types, equipment locations, and therefore exact noise levels generated by future individual projects within the project area cannot be determined at this point in the planning process. Additionally, the locations of future NSLUs may change during future construction phases and cannot be determined to be outside the setback distances described in Table 5.9-4. Therefore, calculations of noise levels at specific receptor locations are not possible at this time, and nighttime construction impacts are determined to be potentially significant.

Construction Traffic Noise

Exact transportation routes for construction traffic are not known at this time. However, based on the conceptual staging area locations and access routes within the project area depicted on Figure 3-4, trucks are anticipated to use major roadways adjacent to the Airport, including Aero Drive, Balboa

Avenue, and Kearny Villa Road. Due to the existing high volumes of traffic on Aero Drive, Kearny Villa Road, and Balboa Avenue, construction traffic is not expected to cause a perceptible increase in noise levels over existing conditions.

Because of a planned haul route at the northern edge of the airport, construction traffic may exit the project area at Ponderosa Avenue to access Balboa Avenue. The addition of heavy trucks to this roadway may cause noise levels to increase by 3 dBA when compared to existing conditions. However, because the properties along Ponderosa Avenue are zoned as Light Industrial (City 2021a), it is not expected that NSLUs would be located along this roadway during future individual projects requiring construction traffic on Ponderosa Avenue. As such, impacts are considered less than significant.

5.9.4.6 Issue 6: Vibration

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

During construction, the largest potential source of vibration is anticipated to be a vibratory roller, primarily used to achieve soil, aggregate and asphalt compaction. Vibratory rollers may be used in the construction of taxiways, runways, or tarmac. Existing hangars located on the site designated as historic (IS Architecture 2025), and any other structures that may be designated as historic in the future, may be susceptible to construction vibration damage. A large vibratory roller is assumed to generate a vibration level of approximately 0.210 inch/second (in/sec) PPV at a distance of 25 feet (Caltrans 2020). If vibratory rollers are required within 22 feet of historic structures within the project area, an exceedance of the 0.25 in/sec PPV vibration criteria for potential architectural damage to historical structures from continuous/frequent sources may occur¹ and would result in a potentially significant impact.

No off-site historic structures are located in the vicinity of the project area that would be exposed to excessive vibration. Although some vibration during construction may be perceptible to nearby off-site receptors, temporary impacts associated with the vibratory roller (and other potential equipment) would be less than significant.

5.9.5 Significance of Impacts

5.9.5.1 Ambient Noise

Noise levels associated with additional vehicle trips generated by the implementation of the project would not result in a doubling of traffic volumes along nearby roadways and would, therefore, not cause a 3 dBA increase in noise levels. Noise impacts related to ambient noise level increases from vehicular traffic would be less than significant.

¹ Equipment PPV = Reference PPV * (25/D)ⁿ (in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013.

5.9.5.2 Noise – Land Use Compatibility

Implementation of the proposed project is not expected to generate noise levels that exceed the standards established in the Noise Element of the General Plan. Impacts related to compatibility with respect to vehicular and aircraft noise would be less than significant.

5.9.5.3 Aircraft Noise

The land uses within the proposed project would be compatible with the ALUCP noise contours. Impacts related to compatibility with respect to vehicular noise would be less than significant.

5.9.5.4 San Diego Municipal Code – On-Site Generated Noise

The specific uses associated with the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road are yet to be determined; therefore, there is potential that these uses could include noise sources that generate elevated noise levels at the adjacent southern property line, across from which (across Aero Drive) are parcels zoned as Residential Mixed-Use and Employment Mixed-Use. As such, there is potential that noise levels could exceed property line noise limits, and impacts are conservatively considered potentially significant.

5.9.5.5 Construction Noise

Potential daytime and nighttime construction activities for individual projects under the project could result in noise levels at nearby NSLUs in excess of limits established in the SDMC. The exact equipment types, equipment locations, and therefore exact noise levels generated by future individual projects within the project area cannot be determined at this point in the planning process. Additionally, the locations of future NSLUs may change during future construction phases and cannot be determined to be outside the setback distances described in Table 5.9-3 and 5.9-4. Therefore, calculations of noise levels at specific receptor locations are not possible at this time, and impacts are determined to be potentially significant.

5.9.5.6 Vibration

A vibratory roller could be used during construction within 22 feet of historic on-site structures and could result in an exceedance of the 0.25 in/sec PPV vibration criteria for potential architectural damage to historical structures. Therefore, vibration impacts during construction are considered potentially significant.

5.9.6 Mitigation Framework

5.9.6.1 San Diego Municipal Code – On-Site Generated Noise

To reduce potential on-site stationary noise generation impacts, mitigation measure MM NOI-1 would be required.

MM NOI-1 Operational Property Line Limits. Noise levels from operational noise generated by the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road

shall meet the City Noise Abatement and Control Ordinance standards for multi-family residential uses at the southern boundary of the AMP area. These standards are 55 dBA L_{EQ} during the hours between 7:00 a.m. and 7:00 p.m., 50 dBA L_{EQ} during the hours between 7:00 p.m. and 10:00 p.m., and 45 dBA L_{EQ} during the hours between 10:00 p.m. and 7:00 a.m.

5.9.6.2 Construction Noise

To reduce potential construction noise impacts, mitigation measures MM NOI-2 and MM NOI-3 would be required.

MM NOI-2 Construction Noise Level Standards. Construction noise from construction activities of future individual projects shall comply with the thresholds and hours specified by the City of San Diego. Daytime construction activities shall comply with the 75 dBA L_{EQ} (12 hour) standard when measured at or beyond the property lines of any property zoned residential. Construction activity shall not increase traffic on nearby roadways so that traffic noise increases 3 dBA over existing levels.

Nighttime construction is defined as construction occurring between the hours of 7:00 p.m. and 7:00 a.m. Nighttime construction shall require the granting of a permit prior to construction by the Noise Abatement and Control Administrator. If nighttime construction is required, it shall comply with the Sound Level Limits defined in the City Municipal Code, Chapter 5, Article 9.5, Division 4, §59.5.040. At single-family residential zones, noise generated by construction equipment shall not exceed 45 dBA L_{EQ} (one hour) between the hours of 7:00 p.m. and 10:00 p.m. or 40 dBA L_{EQ} (one hour) between the hours of 10:00 p.m. and 7:00 a.m. At multi-family residential zones, noise generated by construction equipment shall not exceed 50 dBA L_{EQ} (one hour) between the hours of 7:00 p.m. and 10:00 p.m. or 45 dBA L_{EQ} (one hour) between the hours of 10:00 p.m. and 7:00 a.m. At all other residential zones, noise generated by construction equipment shall not exceed 55 dBA L_{EQ} (one hour) between the hours of 7:00 p.m. and 10:00 p.m. or 50 dBA L_{EQ} (one hour) between the hours of 10:00 p.m. and 7:00 a.m. At commercial zones, noise generated by construction equipment shall not exceed 60 dBA L_{EQ} (one hour) between the hours of 7:00 p.m. and 7:00 a.m.

MM NOI-3 Construction Noise Management Plan. The construction specifications of all future individual projects within the AMP area shall require preparation of a Construction Noise Management Plan prior to the onset of construction. The plan shall be specific to the conditions at the time of construction. The plan shall determine if construction equipment noise levels would be equivalent to those described in this report, and if so, whether noise-sensitive receptors are located within the setback distances described in this report. If construction noise for future individual projects are determined to exceed the noise levels described in this report at nearby receptors, specific measures to reduce construction noise shall be implemented. These measures may include:

- Description of precise equipment to be used during construction.

- Noise level specifications for precise equipment to be used during construction.
- Location of noise-sensitive receptors prior to construction with distances to potential noise-generating construction activity.
- Placement of noise-generating equipment as far as feasible from noise-sensitive receptors.
- Utilization of enclosures or other barriers for equipment to reduce noise levels.
- Construction equipment properly outfitted and maintained with manufacturer-recommended noise-reduction devices.
- Diesel equipment operated with closed engine doors and equipped with factory-recommended mufflers.
- Written notification to noise-sensitive receptors within 100 feet of the project's property line. Notification to include a description of activities anticipated, expected dates and hours for construction, and contact information with details of a complaint and response procedure.

5.9.6.3 Vibration

To reduce vibration at vibration-sensitive hangars within the project area, mitigation measure MM VIB-1 would be required.

MM VIB-1 Construction Vibration Limits Near Historic Structures. Vibration-generating construction equipment shall not generate vibration levels that exceed 0.25 in/sec PPV at historic structures. This shall be demonstrated by ensuring that construction plans associated with future projects prior to approval specify that large vibratory rollers are to be set back from historic structures by 22 feet or be used in static mode only (no vibrations) when operating within 22 feet of historic structures or occupied residences. If vibration-generating equipment other than large vibratory rollers are used during construction, project construction plans shall include specifications that demonstrate that vibration limits do not exceed 0.25 in/sec PPV at the historic structure or occupied residences.

5.9.7 Significance of Impacts After Mitigation

5.9.7.1 San Diego Municipal Code – On-Site Generated Noise

Implementation of mitigation measure MM NOI-1 would ensure that noise levels remain within City standards and impacts would be mitigated to a less-than-significant level.

5.9.7.2 Construction Noise

Implementation of mitigation measures MM NOI-2 and NOI-3 would ensure that noise levels remain within City standards and impacts would be mitigated to a less-than-significant level.

5.9.7.3 Vibration

Implementation of mitigation measure MM VIB-1 would reduce potential vibration-related impacts to historic on-site structures to a less-than-significant level.

5.10 Public Services and Facilities

This section of the PEIR analyzes potential impacts to public services and facilities that could result from implementation of the project. Public services and facilities are those functions that serve residents on a community-wide basis and include police protection, fire/life safety protection, parks and recreation facilities, schools, and libraries.

5.10.1 Existing Conditions

The existing environmental setting, which includes a detailed discussion of existing public services and facilities within the AMP area, is contained in Section 2.5.10 of this PEIR. Section 4.10 of this PEIR includes a summary of the regulatory framework relative to public services and facilities.

5.10.2 Methodology and Assumptions

Potential impacts resulting from implementation of the proposed project were evaluated based on relevant information from the General Plan, SDPD, SDFD, AMP, and the adopted Kearny Mesa Community Plan. Based on a review of relevant public facility and safety standards, policies, and population buildout and capacity estimates, the analysis presents the potential for impacts related to constructing facilities within the project area.

5.10.3 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds (City 2022a), which have been adapted to guide a programmatic analysis for the proposed project, impacts on public services and facilities would be significant if the proposed project would:

1. Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, fire/life safety protection, parks or other recreational facilities, schools, or libraries), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

5.10.4 Impact Analysis

5.10.4.1 Issue 1: Public Facilities

Would the proposed project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, fire/life safety protection, parks or other recreational facilities, schools, or libraries), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

Police Protection

The SDPD provides law enforcement services to the AMP area. The Eastern Division of SDPD operates to maintain the citywide response time goals set forth in the General Plan (Public Facilities Element Policy PF-E.2). These response time guidelines include:

- Priority E Calls (imminent threat to life) within 7 minutes
- Priority 1 Calls (serious crimes in progress) within 12 minutes
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes
- Priority 4 Calls (minor requests for police service) within 90 minutes

Implementation of the proposed project would involve upgrades to existing Airport facilities and the construction of 92 hangars. The additional hangars would provide increased storage capacity for the Airport. These types of facilities are not anticipated to result in a substantial increase in the number of police calls for service compared to existing conditions, and no new facilities or improvements to existing facilities would be required. Therefore, direct and indirect impacts of the proposed project on police services would be less than significant.

Fire/Life Safety Protection

SDFD Fire Station 28 is located adjacent to the AMP area at 3880 Kearny Villa Road. As noted in Section 2.0 of this PEIR, although not a designated aircraft rescue and firefighting station for MYF, if available, the station will respond to calls at MYF. This station provides fire protection and advanced life support services and includes a fire engine, aerial truck, and water tender.

Implementation of the proposed project could generate an increased demand for fire and life safety services. However, the proposed project did not identify any deficiencies in relation to existing fire and life safety services, and it would not require the construction of new fire facilities. The proposed project would upgrade existing Airport facilities and construct 92 hangars. Response to calls to the AMP area for emergency fire and life safety service by SDFD Station 28 would be comparable to existing response times and would provide adequate service to the AMP area upon implementation of the project.

According to CAL FIRE mapping, the AMP area is not within a VHFHSZ, though the eastern portion of the AMP area is mapped as within a Moderate Fire Hazard Severity Zone (CAL FIRE 2025). However, according to the City's proposed mapping, all but the developed central portion of the AMP area is within a VHFHSZ (City 2025). Future development or activity under the proposed project could therefore be at risk from exposure to wildland fires. Future development under the project, including the 92 hangars, would be constructed per applicable California Building and Fire codes and would comply with City and SDFD requirements per the SDMC (Chapter 5, Article 5) and standard City procedures. These include SDFD approval of development plans (fire hydrant spacing, emergency vehicle access, and brush management), access to fire hydrants, and inspection of facilities prior to operation. Development would also comply with SDMC regulations specific to wildfire resistant construction and development in areas near natural vegetation (Chapter 14, Article 5). Construction and operation of developments under the proposed project would adhere to all regulatory requirements including adequate fire flow, ongoing maintenance of defensible space, use of fire/wildfire resistance construction, and preparation and maintenance of a Brush Management

Plan. Therefore, direct and indirect impacts of the project on fire/life safety services would be less than significant.

Parks and Recreation/Schools/Libraries

The project does not propose new residential development and thus would not create an increased demand for population-based parks and recreation facilities, schools, or libraries and does not create a need for new facilities in these resource areas. In addition, the project would not displace or deteriorate existing parks and recreation facilities, schools, or libraries. Therefore, implementation of the project would not result in impacts related to parks and recreation facilities, schools, or libraries.

5.10.5 Significance of Impacts

Police Protection

Implementation of the proposed project would not substantially increase the need for police calls for service over existing conditions and no new facilities or improvements to existing facilities would be required. Therefore, no new construction of police facilities which could result in physical changes to the environment would occur as a result of the implementation of the proposed project. Impacts related to police services would be less than significant.

Fire/Life Safety Protection

Implementation of the proposed project would not substantially increase the need for fire/life safety services over existing conditions and no new facilities or improvements to existing facilities would be required. Therefore, no new construction of fire/life safety facilities which could result in physical changes to the environment would occur as a result of the proposed project. Impacts related to fire/life safety protection would be less than significant.

Parks and Recreation/Schools/Libraries

Implementation of the proposed project would not increase the population or result in the need for additional parks and recreation, school, or library facilities that could result in physical changes to the environment. Therefore, impacts related to parks and recreational, schools, and libraries would not occur.

5.10.6 Mitigation Framework

Implementation of the proposed project would result in less than significant impacts to public services. No mitigation is required.

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5.11 Public Utilities

This section of the PEIR addresses potential impacts to public utilities, including those related to water supply, utility infrastructure (i.e. stormwater, sewer, and water distribution facilities), communication systems, and solid waste management, that could result from implementation of the project.

5.11.1 Existing Conditions

The existing environmental setting, which includes a discussion of existing public utilities in the vicinity of the AMP area, is contained in Section 2.5.11 of this PEIR. Section 4.11 of this PEIR includes a summary of the regulatory framework relative to public utilities.

5.11.2 Methodology and Assumptions

Potential impacts resulting from implementation of the proposed project were evaluated based on relevant information from the General Plan, CalRecycle, and SDCWA's UWMP.

5.11.3 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds (City 2022a), as modified to guide a programmatic analysis of the proposed project, a significant public utilities impact would occur if implementation of the proposed project would:

1. Use excessive amounts of water beyond projected available supplies;
2. Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives; or
3. Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's CAP.

5.11.4 Impact Analysis

5.11.4.1 Issue 1: Water Supply

Would the proposed project use excessive amounts of water beyond projected available supplies?

The MWD and the SDCWA have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. MWD's RUWMP and IWRP, and the SDCWA's UWMP and annual water supply report include water infrastructure projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water.

The City's 2020 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur by 2045 (City 2021b). Based on a normal water supply year, the estimated water supply projected in five-year increments for a 25-year projection will meet the City's projected water demand of 202,865 AF in 2025; 210,547 AF in 2030; 217,156 AF in 2035; 223,598 AF in 2040; and 228,065 AF in 2045 (City 2021b). Based on a single-dry year forecast, the estimated water supply will meet the projected water demand of 210,169 AF in 2025; 218,128 AF in 2030; 224,973 AF in 2035; 231,648 AF in 2040, and 236,274 in 2045 (City 2021b). Based on a multiple-dry year, third year supply, the estimated water supply will meet the projected demands of 210,169 AF in 2025; 218,128 AF in 2030; 224,973 AF in 2035; 231,648 AF in 2040; and 236,274 AF in 2045 (City 2021b).

Most of the improvements proposed under the project, which include improvements related to runways, taxiways, runup areas, hangars, and tie-downs, would not result in an increased demand for water within the AMP area. While the terminal expansion and provision of an aircraft wash rack would result in an increased water usage, the amount of water anticipated to be required for such operations would not substantially increase water demand beyond what is currently used within the AMP area or beyond projected available supplies for the AMP area. As such, there is sufficient water planned to supply the annual usage for the proposed project, and the water demand resulting from the proposed project would result in no unforeseen or excessive demands.

In summary, the proposed project would be consistent with the water demand assumptions outlined in the City's UWMP. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve projected water demands.

5.11.4.2 Issue 2: Utilities

Would the proposed project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

The AMP area is currently served by storm water, sewer, and water infrastructure, as well as various communication systems. The current capacity for all utilities is adequate for existing demands. However, capacity improvements may be required to serve projected future demands. Systematic improvements to water, wastewater, and storm water facilities are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing water, sewer, and storm water pipelines and mains are an ongoing process. Upgrades to water and sewer are administered by the PUD and are handled on a project-by-project basis. Upgrades to and maintenance of public storm water facilities or facilities granted and accepted via easement are administered by the City's Storm Water Department.

Storm Water

The southern and central portion of the AMP area is developed with impervious surfaces associated with the existing buildings and runway areas. However, the remainder of the AMP area consists of natural surfaces characterized by a mix of vegetation communities and vernal pools. Future projects

in the AMP area would be required to adhere to NPDES requirements to control direct storm water discharges and to the City's Storm Water Standards Manual. The Storm Water Standards Manual contains requirements that dictate design elements in development and redevelopment projects. Requirements pertaining to storm water runoff include LID BMPs, such as bioretention basins, cisterns, and rain barrels, to retain storm water on-site and limit runoff. The Storm Water Standards Manual also includes HMP requirements which include design elements to limit storm water runoff discharge rates and durations.

No storm water facilities are proposed at this time in conjunction with the proposed project. If individual improvements initiated under the project required improvements to the storm drain system, they would be identified as part of the design and review process. Such future improvements would be required to comply with the requirements of applicable City standards and design guidelines.

Sewer

The project does not currently propose new sewer collection or wastewater treatment facilities. If individual improvements initiated under the project require improvements to the sewer system, they would be required to comply with the SDMC regulations regarding sewers and wastewater facilities and would be required to follow the City's Sewer Design Guidelines.

Water Facilities

Future development under the proposed project may result in a minimal increase in demand for water. No new water distribution or treatment facilities are proposed in conjunction with the project. If individual improvements initiated under the project require improvements to the water facilities, they would be required to comply with the City standards, including meeting any new fire flow requirements.

Communication Systems

Private utility companies currently provide communications systems within the AMP area. Future development implemented in accordance with the proposed project is not anticipated to result in an increased demand for new communication systems. Associated utility improvements to existing communication systems would be determined on an individual basis. As development is initiated within the Airport, coordination with communications utility providers would occur as part of project design and review process.

5.11.4.3 Issue 3: Solid Waste Management

Would the proposed project result in impacts to solid waste management, including the need for construction of new solid waste infrastructure; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan?

CalRecycle provides estimates of solid waste generation rates for different types of land uses. Waste generation rates include all materials discarded, regardless of whether they are later recycled or disposed of in a landfill, since under state law the total amount of waste "generated" is considered to be the sum of the waste "disposed of" plus the waste "diverted" from disposal. Waste generation

rates can be used to estimate the impact of new development on the local solid waste infrastructure, although it should be noted that impacts to solid waste infrastructure are not necessarily based on the amount of waste but whether any increase would require the development of new facilities. Since the majority of waste is managed through waste diversion, solid waste facilities include those necessary to provide composting, recycling, and other collection, separation, and diversion services. Furthermore, it is specifically the amount of waste remaining for disposal that is considered for compliance with the City's CAP and has the greatest potential for impacts associated with GHG emissions.

Improvements implemented by the project would be required to comply with City regulations, including the City's Recycling Ordinance, Demolition Ordinance and Section 142.0801 et seq. of the LDC, which outlines the requirements for refuse and recyclable materials storage. In addition, a WMP is required for any project which exceeds the City's threshold, currently the generation of 60 or more tons of solid waste for projects of 40,000 SF or more. The WMPs would include measures to provide sufficient interior and exterior storage space for refuse and recyclable materials. The proposed AMP contains an Airport Recycling, Reuse, and Waste Reduction Plan (Appendix L of the AMP [C&S 2019]) intended to outline the existing sources of Airport waste and provide guidance on establishing a comprehensive waste reduction and recycling program.

No new solid waste disposal facilities have been identified because receiving landfills (Miramar, Otay, and Sycamore landfills) have adequate capacity. The General Plan addresses waste management in Policies PF-I.1 through PF-I.5, focusing on waste recycling and diversion of materials in PF-I.2. The proposed project would not affect the City's overall ability to attain a 75 percent recycling target as required under AB 341. Additionally, the City has adopted a Zero Waste Plan, which would result in 70-percent waste diversion by 2020, 90 percent waste diversion by 2035, and 100 percent diversion by 2040. Furthermore, mandatory compliance with the SDMC and the City's Recycling Ordinance would continue to reduce solid waste generation and increase recycling efforts.

5.11.5 Significance of Impacts

5.11.5.1 Water Supply

There is sufficient water supply to serve existing and projected demands associated with implementation of the proposed project, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Therefore, impacts of the proposed project on water supply would be less than significant.

5.11.5.2 Utilities

Storm Water

Upgrades to water and sewer are administered by the PUD and are handled on a project-by-project basis. Future development implemented under the proposed project would be reviewed by the City to determine any significant adverse effects to the City's storm water system, as well as any significant impacts associated with the installation of new storm water infrastructure, and these significant impacts would be avoided. Therefore, impacts to storm water utilities as a result of implementation of the proposed project would be less than significant.

Sewer

As discussed above, systematic improvements to sewer facilities are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing sewer pipelines and mains are an ongoing process. Upgrades to sewer are administered by the PUD and are handled on a project-by-project basis. Future development implemented under the proposed project would be reviewed by the City to determine any significant adverse effects to the City's wastewater system, as well as any significant impacts associated with the installation of new wastewater infrastructure, and these significant impacts would be avoided. Therefore, impacts to sewer utilities as a result of implementation of the proposed project would be less than significant.

Water Facilities

As discussed above, systematic improvements to water facilities throughout the project area are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing water pipelines and mains are an ongoing process. Upgrades to water are administered by the PUD and are handled on a project-by-project basis. Future improvements implemented under the proposed project would be reviewed by the City to determine any significant adverse effects to the City's water distribution system, as well as any significant impacts associated with the installation of new water infrastructure, and these significant impacts would be avoided. Therefore, impacts to water utilities as a result of implementation of the proposed project would be less than significant.

Communications Systems

No specific communications systems improvements are proposed as part of the project. Improvements would be determined at the project level. As individual improvements are initiated under the proposed project, coordination with communications utility providers would occur as part of project design. Therefore, impacts associated with communications systems as a result of implementation of the proposed project would be less than significant.

5.11.5.3 Solid Waste Management

It is anticipated that implementation of the proposed project could increase the solid waste management needs within the AMP area. However, the proposed project would be required to comply with the SDMC, and the project includes an Airport Recycling, Reuse, and Waste Reduction Plan. In addition, any future development exceeding the 60-ton threshold must prepare a WMP targeting a 75 percent waste reduction. Therefore, impacts to solid waste management as a result of implementation of the proposed project would be less than significant.

5.11.6 Mitigation Framework

Impacts associated with public utilities would be less than significant; therefore, no mitigation is required.

5.12 Transportation

This section of the PEIR addresses potential impacts related to transportation that could result from implementation of the project. Information in this section is based on the *City of San Diego Airport Master Plan - Montgomery-Gibbs Executive Airport Transportation Impact Analysis and Local Mobility Analysis* (CR Associates 2025), which is included as Appendix J of this PEIR.

5.12.1 Existing Conditions

The existing environmental setting, which includes a description of existing conditions relative to roadways and access, and bicycle, pedestrian, and public transportation facilities, is contained in Section 2.5.12 of this PEIR. Section 4.12 of this PEIR includes a summary of the regulatory framework associated with transportation and traffic circulation.

5.12.2 Methodology and Assumptions

5.12.2.1 Vehicle Miles Traveled Analysis

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts, and replacement with VMT as the preferred CEQA transportation metric.

In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including the new section 15064.3. Under Section 15064.3, VMT, which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts." As of July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT. The City adopted its Transportation Study Manual (TSM; City 2022d) in 2020, consistent with the State CEQA Guidelines; the analysis presented in this report is based on the most recent version dated September 2022.

Per the City TSM, a detailed transportation VMT analysis applies to all land development projects, except those that meet at least one of the screening criteria described below:

1. Residential or Commercial Project Located in a VMT Efficient Area – The project is a residential or commercial employment project located in a VMT efficient area (15 percent or more below the base year average VMT per Capita or VMT per Employee) based on the applicable location-based screening map produced by SANDAG.
2. Industrial Project - The project is an industrial employment or agricultural employment project located in VMT efficient area (in an area with average or below average base year VMT per Employee) based on the applicable location-based screening map produced by SANDAG.
3. Small Project - The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.

4. **Locally Serving Retail Project** – The project is a locally serving retail project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the San Diego Municipal Code Land Development Code Trip Generation Manual. Adding retail square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is not screened out.
5. **Locally Serving Public Facility** - The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.
6. **Affordable Housing** - The project has access to transit and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50 percent of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens [as defined in Section 143.0720(e)], housing for transitional foster youth, disabled veterans, or homeless persons [as defined in 143.0720(f)]. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking per unit, per San Diego Municipal Code Section 143.0744. Only the portion of the project that meets the above criteria is screened out. For example, if the project is 100 units with 10 deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the 10 affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).
7. **Mixed-Use Project** - The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail component was screened out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.
8. **Redevelopment** - The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts per Table 3 of the City TSM.

If the proposed project's land uses (evaluated separately) meet at least one of the screening criteria listed above, they would be screened out from completing a detailed VMT analysis.

5.12.2.2 Trip Generation Analysis

A trip generation analysis was conducted to determine the level of analysis required for the proposed project. The estimated increase in annual flight operations for the Airport between 2017 and 2037 is 20,265 operations (refer to Table 3-1 in Chapter 3.0), which equals 56 daily flight operations. According to the City Trip Generation Manual (City 2003), the trip generation rate for a general aviation airport like MYF is estimated at 2 trips per flight. Therefore, an increase of 56 flights would lead to an additional 112 average daily trips. However, to ensure accuracy as this estimate might not reflect the actual trip generation for MYF, a trip generation validation was conducted. This validation considered the current daily traffic originating from the project site, on-site personnel, and flight operations.

The trip validation was conducted by comparing current driveway counts with existing airport operations, including the number of flights and staff. The validation includes the following steps:

- **Step 1: Determine Existing Operations.** MYF currently has two types of vehicular trips, those that are associated with flight support (field staff, mechanics, control tower, etc.) and those that are associated with each flight (pilot). The total number of on-site personnel is approximately 147 airport staff to maintain daily operations. For a conservative analysis, it is assumed that airport staff would make two trips per day, one in-bound and one-outbound. The total number of airport operations that occurred during the period that seven-day driveway counts were conducted is 5,805 take-offs and landings, with a daily average of 829 take-offs and landings.
- **Step 2: Determine Existing Trips.** Existing driveway vehicular counts were conducted over a seven-day period. Based on this count, MYF currently generates 2,084 daily average vehicular trips. This vehicular traffic includes trips generated by airport staff, pilots, and passengers.
- **Step 3: Determine Trip Generation per Flight.** The trip generation rate per flight was determined by initially deducting the number of trips linked to flight support and then dividing the residual average daily trips by the average number of flights. An average of 2.2 vehicle trips are generated per flight operation at MYF.

The trip generation for the year 2037 was estimated by multiplying 2.2 trips per flight by the total increased number of flights (56). This analysis assumes that based on the current number of on-site personnel (147) and the average daily flight operations (829), one staff member is needed for every 6 flights. The increased number of flights is forecasted to generate 141 daily unadjusted driveway vehicle trips. In addition, it is assumed that the public viewing area would generate 10 daily trips, resulting in a total of 151 daily unadjusted driveway vehicle trips associated with implementation of the project under future year 2037 conditions.

5.12.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2022a), a significant impact related to transportation would occur if implementation of the proposed project would:

1. Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities;
2. Result in VMT exceeding thresholds identified in the City TSM;
3. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access.

5.12.4 Impact Analysis

5.12.4.1 Issue 1: Conflict with Plans/Policies

Would the proposed project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?

Construction of improvements proposed under the project would result in increased vehicular traffic on regional and local roadways in association with commuting construction workers and trucks hauling materials to and from work areas. Because the project includes various improvements that would be constructed at different times and locations, construction-generated traffic would not all occur at the same time or along the same roadway segments (refer to Figure 3-4 for anticipated access routes). As such, while construction of the project would generate additional traffic, traffic levels would not substantially increase in a manner that would cause congestion or decrease the performance of the circulation system. In addition, construction work areas would be located within the Airport property; no work would occur outside the Airport property within public roadway right-of-way. Therefore, the project would not result in physical disruptions to roadways or transit facilities, bike lanes, or sidewalks that are present along Aero Drive. Construction-related impacts are considered less than significant.

During operations, the project is anticipated to generate 151 daily trips above existing conditions. Because the project would generate fewer than 1,000 daily trips and is consistent with the community plan and zoning designation, the project is screened out from having to conduct a local mobility analysis per the City TSM. The project also does not involve improvements related to public roadways that could affect transit, bicycle, or pedestrian facilities. The project can therefore be presumed to not conflict with an adopted program, plan, ordinance, or policy addressing the circulation system. Operational impacts are considered less than significant.

5.12.4.2 Issue 2: Vehicle Miles Traveled

Would the proposed project result in VMT exceeding thresholds identified in the City TSM?

As detailed above in Section 5.12.2.1, the City TSM provides a VMT screening list for projects that, absent substantial evidence to the contrary, do not typically cause substantial or measurable increases in VMT and are presumed to have a less than significant impact related to VMT.

According to the City's VMT screening list and applicable CEQA guidelines, the project can be screened out from having a significant impact related to VMT based on the Small Project criterion. The project is anticipated to generate 151 daily unadjusted driveway vehicle trips under future year 2037 conditions, which is less than the 300 daily unadjusted driveway trips specified under the Small Project criterion. Therefore, the project would have a less-than-significant VMT-related impact under CEQA.

5.12.4.3 Issue 3: Traffic Hazards

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

As mentioned above in Section 5.12.4.1, construction work areas would be located within the Airport property; no work would occur outside the Airport property within public roadway right-of-way. Therefore, the project would not result in hazardous traffic conditions during construction. Similarly, new MYF operational components would be located within the Airport property, and the project does not propose any roadway modifications or improvements in relation to roadway circulation. Traffic generated during project operations would also utilize existing ingress and egress points at the Airport. Operation of the project would therefore not substantially increase hazards due to a design feature or incompatible uses. Impacts would be less than significant.

5.12.4.4 Issue 4: Emergency Access

Would the proposed project result in inadequate emergency access?

As mentioned above in Section 5.12.4.1, construction work areas would be located within the Airport property; no work would occur outside the Airport property within public roadway right-of-way. Therefore, the project would not involve roadway or lane closures that could result in inadequate emergency access during construction. Similarly, new MYF operational components would be located within the Airport property and would not affect emergency access along roadways. In addition, the project would not generate a high level of traffic on local roadways that would interfere with emergency response. Impacts would be less than significant.

5.12.5 Significance of Impacts

5.12.5.1 Conflict with Plans/Policies

Implementation of the project would not generate vehicular traffic or affect the local transportation network in a manner that would conflict with an adopted program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

5.12.5.2 Vehicle Miles Traveled

Implementation of the project would not generate VMT that would exceed thresholds in the City TSM. Impacts would be less than significant.

5.12.5.3 Traffic Hazards

Implementation of the project would not increase traffic hazards due to a design feature or incompatible uses. Impacts would be less than significant.

5.12.5.4 Emergency Access

Implementation of the project would not result in inadequate emergency access. Impacts would be less than significant.

5.12.6 Mitigation Framework

Implementation of the proposed project would result in less than significant impacts to transportation. No mitigation is required.

5.13 Visual Effects and Neighborhood Character

This section of the PEIR discusses visual effects resulting from implementation of the proposed project and potential for impacts on neighborhood character and includes a description of the built and natural visual resources within the MYF area.

5.13.1 Existing Conditions

The existing environmental setting, which includes a detailed discussion and description of existing visual resources within the AMP area is contained in Section 2.5.13 of this PEIR. Section 4.13 of this PEIR includes a summary of the regulatory framework relative to visual resources, which describes applicable urban design guidelines, ordinances, and regulations.

5.13.2 Methodology and Assumptions

Potential visual effects and neighborhood character impacts resulting from implementation of the proposed project were evaluated using information from existing conditions assessments of urban design, recreation, and conservation in the AMP area. The assessment was made using data from observations, a spatial analysis, and a photographic inventory.

5.13.3 Significance Determination Thresholds

Thresholds have been modified from the City's CEQA Significance Determination Thresholds (City 2022a) to reflect a programmatic analysis for the proposed project. Impacts related to visual effects and neighborhood character would be significant if the proposed project would:

1. Result in a substantial obstruction of a vista or scenic view from a public viewing area identified in the Kearny Mesa Community Plan;
2. Result in a substantial adverse alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area;
3. Result in a substantial change in the existing landform;
4. Create substantial light or glare which would adversely affect daytime and nighttime views in the area; or
5. Result in the loss of any distinctive or landmark tree(s) or stand of mature trees as identified in the Kearny Mesa Community Plan.

5.13.4 Impact Analysis

5.13.4.1 Issue 1: Scenic Vistas or Views

Would implementation of the proposed project result in a substantial obstruction of a vista or scenic view from a public viewing area identified in the Kearny Mesa Community Plan?

MYF lies within the planning boundaries of the Kearny Mesa Community Plan. The Kearny Mesa Community Plan does not identify scenic vistas within the boundaries of the entire community. However, the Kearny Mesa Community Plan does identify public viewsheds, some of which are in the vicinity of the Airport; these include interior canyon views, panoramic views, and view overlooks along public roadways, pedestrian paths, and within canyons. Specifically, the Kearny Mesa Community Plan identifies public viewsheds to the southeast of MYF, including panoramic views adjacent to Daley Center Drive and interior canyon views and view overlooks adjacent to West Canyon Avenue. The project does not involve improvements in the southeastern portion of the Airport property, near where these viewsheds are located.

Additionally, project development would occur entirely within the boundaries of MYF, with the exception of an encroachment into the hotel leasehold on the southwest side to accommodate additional hangar space and would be a continuation of the existing land use pattern. Airside improvements include the redesign and upgrades to pavement, runways, taxiways, navigational features, etc. Structural landside improvements are clustered in the southwestern portion of the project area and include additional hangars. Any building associated with the project would be required to meet the FAA guidelines, which restrict structure height within the AMP area to a maximum of 35 feet. Thus, no new structures would be introduced that would obstruct any views into or across the AMP area.

Therefore, since the AMP area does not include scenic vistas, does not include development within or adjacent to a public viewshed, or introduce structures that would disrupt the existing views into or across the AMP area, the project would have a less than significant impact with regard to a substantial obstruction of a vista or scenic view from a public viewing area, including public viewsheds.

5.13.4.2 Issue 2: Neighborhood Character

Would implementation of the proposed project result in a substantial alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area?

The project area is within the planning boundaries of the Kearny Mesa Community Plan. As shown in the planned land use for the Kearny Mesa Community Plan, MYF is surrounded by lands that are designated for industrial technology parks, community commercial, urban employment villages, and high-density residential land uses. The bulk, scale, and materials of the current structures surrounding the project area are limited by the FAA guidelines that restrict structure height to a maximum of 35 feet and the use of reflective or glare producing materials for buildings within the AIA. Similarly, the FAA guides the bulk, scale, and materials for structures that are within the project area.

Implementation of the project would occur entirely within the existing boundaries of MYF, apart from an encroachment into the hotel leasehold on the southwest side, which has operated as a general aviation airport since 1937. The project includes a combination of airside and landside components: 92 new hangars, 48 new tie-down areas, potential improvements to the terminal building, aircraft wash rack, and the reconfiguration of several taxiways. These improvements, modifications and reconfigurations are consistent with the existing airfield land uses and visual elements.

The proposed project would construct a total of 92 hangars in the southwest portion of the Airport. The proposed hangars would not exceed 35 feet in height and would be consistent with the character and style of the existing Airport hangars. Similarly, the expanded terminal building would be consistent with the character and style of the existing terminal building. All other improvements associated with implementation of the project, such as pavement maintenance and the installation of wash racks, would not change the existing visual environment.

The introduction of similar elements would be visually compatible with the existing neighborhood character. The project would be implemented over three phases spanning 20 years. The first phase would consist of the runway and taxiway improvements and reconfigurations, which would improve airside operations to meet FAA criteria. The second phase would involve new pavement and preventative maintenance in the existing hangars area, and the addition of hangars, tie-down areas, fencing, lighting, and electrical upgrades. The last phase would include larger capital improvement projects such as the terminal expansion, new large box hangars north of the hotel, the public viewing area, the self-service fuel farm and aircraft wash rack improvements, as well as associated roadway demolition and realignment. Given that development associated with the project would occur on lands that currently and historically have supported aviation uses and it would occur gradually over a 20-year period, impacts related to substantial alterations to the existing or planned character of the area would be less than significant.

5.13.4.3 Issue 3: Landform Alteration

Would the proposed project result in a substantial change in the existing landform?

The topography of the developed portion of the Airport is generally flat. The Airport ranges in elevation from approximately 405 above mean sea level (AMSL) to 420 AMSL throughout most of the property and does not contain any prominent landforms.

With the exception of an encroachment into the hotel leasehold on the southwest side to accommodate additional hangar space, all proposed project development and improvements would occur within the existing footprint of MYF. Some minor cut and fill and site grading would occur with the various improvements and reconfigurations; however, given the developed nature of the AMP area, the relatively level site conditions, and the lack of significant landform, development associated with the project would have a less than significant impact on landform alteration.

5.13.4.4 Issue 4: Light and Glare

Would the proposed project create substantial light or glare which would adversely affect daytime or nighttime views in the area?

The FAA has regulations pertaining to minimizing light and glare and the airport lighting scheme is required to be in conformance with FAA lighting standards. Presently the Airport has safety and navigational lighting along the airside facilities as well as other exterior sources of light such as parking lot and vehicle lighting, security lighting, and landscape lighting. Light also emanates from the interior of the terminal and hangars. In addition to the light sources currently generated by the Airport, several of the surrounding land uses support streetlights along roadways and parking lots,

illuminated signs, landscape and security lighting, and light emitted from the interiors of the non-residential buildings.

As discussed in Chapter 2.0 of this PEIR, current facilities at MYF produce light. Both airside and landside activities associated with the project would modify the existing lighting environment at MYF. Navigational and safety lighting would be altered in conjunction with the reconfiguration of the taxiways and with the removal of the Runway 28R displaced threshold, which would require the installation of MALSR east of the future threshold. Other lighting within the airside facilities of the Airport would be upgraded. These sources of light would be similar in nature as to what presently exists and would be designed to meet the FAA safety regulations but not to intrude upon neighboring land uses.

Landside improvements would also introduce new sources of lighting. As the terminal expands and eventually new hangars, tie downs, and apron areas become operational in the later phases of the project, nighttime security lighting as well as light emanating from inside the new buildings would contribute additional sources of light to the AMP area. Additional lighting would also be provided in conjunction with the parking lot expansion. However, this lighting would be directed towards onsite project activities to avoid spillover onto adjacent land uses. Consistent with the existing hangars, new hangars would not be built with expanses of reflective materials producing glare which typically include window glass, solar panels, and certain types of metal; in addition to visual impacts this would be a hazard to aviation operations. MYF would be required to file a Notice of Proposed Construction or Alteration Form 7460-1 that includes a statement that the project would not cause a visual impact, including related to glare. The form would be reviewed and approved by the FAA. In addition to regulating the airside lighting components, the FAA regulates the location, type, and height of all airfield light sources. The additional landside light sources would be low intensity, shielded, and directional/downcast. The area already has similar lighting to the surrounding industrial and commercial buildings and there are no residential land uses adjacent to the site.

The Airport would be required to comply with applicable regulations as set forth in the SDMC (Sections 142.0730 and Sections 142.0740). SDMC Section 142.0730 regulates glare and mandates that no greater than 50 percent of the exterior of a building be composed of reflective material that has a light reflectivity factor greater than 30 percent. Additionally, pursuant to SDMC Section 142.0730(b), reflective building materials are not permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space. Lighting impacts to MHPA areas would be regulated through compliance with MHPA LUAGs. Proposed lighting where adjacent to the MHPA would be limited, directed away from the MHPA, and shielded to protect the MHPA from artificial night lighting. MALSR lighting proposed within the MHPA would be the minimum necessary to meet the requirements set forth by the FAA.

The purpose of the City's outdoor lighting regulations (SDMC Section 142.0740) is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building Regulations, where applicable, or otherwise direct, shield, and control light to keep it from falling onto surrounding properties. The City's regulations prohibit

direct-beam illumination from leaving the premises and require that most outdoor lighting be turned off between 11:00 p.m. and 6:00 a.m., with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 p.m., for public safety).

Lighting and glare restrictions are also contained in the MYF ALUCP. Section 2.6.2(a)(2)(iii) of the MYF ALUCP requires ALUC review of projects within Review Area 2 that would have the potential to create electrical or visual hazards to aircraft in flight, including: electrical interference with radio communications or navigational signals; lighting which could be mistaken for airport lighting; glare or bright lights (including laser lights) in the eyes of pilots or aircraft using the airport; certain colors of neon lights (especially red and white) that can interfere with night vision goggles; and impaired visibility near the airport. Additionally, Section 3.5.6 (a)(1) of the MYF ALUCP regulates potential sources of glare (such as from mirrored or other highly reflective buildings or building features) or bright lights (including search lights and laser light displays).

Through compliance with existing development standards and regulations pertaining to lighting and glare contained in the City's SDMC, MHPA Land Use Adjacency Guidelines, and the MYF ALUCP, impacts related to light and glare would be less than significant.

5.13.4.5 Issue 5: Loss of Distinctive or Landmark Trees

Would the proposed project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the Kearny Mesa Community Plan?

No designated distinctive or landmark trees or mature stands of trees occur within the AMP area. While some street trees are present along the roadway corridors within the AMP area, the proposed project would be subject to City Council Policy 900-19, Public Tree Protection, which provides for the protection of street trees. Impacts related to the loss of distinctive or landmark trees would be less than significant.

5.13.5 Significance of Impacts

5.13.5.1 Scenic Vistas or Views

Implementation of the project would not result in substantial alteration or blockage of public views or scenic highways from view corridors, designated open space areas, public roads, or public parks. Therefore, impacts related to scenic vistas or views would be less than significant.

5.13.5.2 Neighborhood Character

The project would result in improvements, modifications, and reconfigurations of existing MYF land uses. No new uses would be introduced, although some new buildings would be constructed. All development associated with the project would take place within the existing footprint that supports aviation land uses, apart from an encroachment into the hotel leasehold on the southwest side. The project would allow for the continuation of the existing land uses to meet FAA design requirements and projected demand. Thus, impacts related to substantial alterations to the existing or planned character of the area would be less than significant.

5.13.5.3 Landform Alteration

Development in accordance with project would not result in substantial landform alteration because the AMP area is developed with existing aviation land uses that are concentrated on level terrain devoid of any prominent landforms. While some minor grading may occur to support project activities, no significant cuts and fills or mass grading would need to occur. Thus, impacts related to landform alteration would be less than significant.

5.13.5.4 Light and Glare

The project would introduce new sources of light as required to meet the FAA regulations. Airside and landside components would also be subject to FAA guidelines as well as the City's guidelines as outlined in the SDMC. With adherence to the City's outdoor lighting and glare regulations, the MHPA LUAGs, and MYF ALUCP lighting and glare regulations, impacts associated with lighting and glare would be less than significant.

5.13.5.5 Loss of Distinctive or Landmark Trees

No designated distinctive or landmark trees or mature stands of trees occur within the AMP area. The proposed project would be consistent with the Kearny Mesa Community Plan tree policies and subject to City Council Policy 900-19 which provides for the protection of street trees. Therefore, impacts related to the loss of distinctive or landmark trees would be less than significant.

5.13.6 Mitigation Framework

Potential impacts associated with scenic vistas or views, neighborhood character, landform alteration, light and glare, and the loss of distinctive or landmark trees resulting from implementation of the proposed project would be less than significant; therefore, no mitigation is required.

6.0 CUMULATIVE IMPACTS

Section 15355 of the CEQA Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” These individual effects may entail changes resulting from a single project or from a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects occurring over a period of time.

Section 15130 of the CEQA Guidelines requires that an EIR discuss the cumulative impacts of a project when the project’s incremental effect would potentially be cumulatively considerable. Cumulatively considerable, as defined in Section 15065(a)(3), means that the incremental effects of the individual project are considerable when viewed in connection with the effects of past projects, other current projects and the effects of probable future projects. Where a lead agency determines the project’s incremental effect would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation, per Section 15130(a)(3).

According to Section 15130(b) of the CEQA Guidelines, the discussion of cumulative impacts “...need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.” Additionally, one of the following two possible approaches is required for considering cumulative effects:

- A list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated region- or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

Pursuant to Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans, and may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans, and the lead agency determines that the regional or area-wide cumulative impacts of the project have already been adequately addressed in a certified EIR for that plan.

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue and the project. For impacts that are regional in nature, such as air quality and GHG, the primary basis for assessing cumulative impacts are standards set by the SDAPCD and the state of California. For the analysis of impacts that are more localized in nature (biological resources; geology and soils; historical, archaeological and tribal cultural resources; human health, public safety, and hazardous materials; hydrology and water quality; land use; noise; public services and

facilities; public utilities; transportation; and visual effects and neighborhood character), the assessment of cumulative impacts is based on the combined potential impacts of the proposed project with the following seven projects, based on proximity to the project (including the projects listed in the AMP that are part of the private leasehold area):

1. Kearny Mesa Community Plan Update (City 2020c; Final EIR published July 2020; the AMP area is within the Kearny Mesa Community Plan boundary)
2. Clairemont Community Plan Update (City 2021a; NOP published January 2020; the AMP area is adjacent to the Clairemont Community Plan boundary).
3. Crownair leasehold development to include new box hangars (private leasehold at the Airport)
4. Corporate Helicopters leasehold development to include new box hangars (private leasehold at the Airport)
5. SDFD development to include large box hangar and apron (private leasehold at the Airport)
6. Executive Airpark leasehold development to include FBO expansion and vehicle parking (private leasehold at the Airport)
7. Executive Airpark leasehold development to include new hangars, tie-downs, wash rack, fuel tanks, solar panels on shade hangars, and vehicle parking (private leasehold at the Airport)

6.1 Air Quality

The analysis provided in Section 5.1, *Air Quality*, is a cumulative analysis by nature because it discusses the proposed project's consistency with the air quality plan for the SDAB (i.e., the RAQS), which relies on the land use plans of jurisdictions within the SDAB. As discussed in Section 5.1, implementation of the proposed project would not generate air emissions that would exceed the thresholds of significance. These thresholds are designed to identify those projects that would result in significant levels of air pollution, and to assist the region in attaining the applicable NAAQS or CAAQS. Thus, implementation of the project would not result in an increase of emissions that would conflict with the implementation of the air quality plan, and cumulative air quality impacts resulting from the implementation of the project would not be cumulatively considerable.

6.2 Biological Resources

Preservation of the region's biological resources has been addressed through the implementation of regional Habitat Conservation Plans. Impacts to biological resources in the City are managed through the City's MSCP SAP and the City's VPHCP. As noted in the Kearny Mesa Community Plan Update PEIR (City 2020d), projects that adhere to the MSCP SAP and VPHCP are not expected to have significant cumulative impacts to resources covered and regulated by the MSCP SAP and VPHCP.

The project proposes components within the MHPA that are not compatible land uses. The improvements for the new hold bay at Taxiway A would be required to meet current FAA design

standards and would result in 0.18 acre of temporary impacts and 0.33 acre of permanent impacts within the MHPA. Disturbed habitat comprises most of this area, although non-native grassland, Diegan coastal sage scrub, and vernal pool also are present in the MHPA impact area. In accordance with MM BIO-9, a BLA may be required to remove this small portion of the MHPA in the AMP area that is proposed for development. As part of the BLA, an area of equivalent or higher biological value would be added adjacent to the current MHPA boundary. Under this scenario, the project's contribution to a significant cumulative impact would not be cumulatively considerable. However, because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies, it is conservatively concluded that the project would not adhere to MSCP SAP and VPHCP for this improvement; therefore, the project has the potential to contribute to a significant cumulative impact related to biological resources.

The other improvements proposed as part of the project would adhere to the MSCP SAP and VPHCP. In addition, potential impacts to biological resources associated with these improvements would be avoided or minimized through implementation of mitigation measures MM BIO-1 through MM BIO-10. Therefore, the majority of improvements proposed under the project would not contribute to potentially significant cumulative impacts to biological resources.

6.3 Geology and Soils

Cumulative impacts related to geologic hazards within the AMP area would be less than significant upon compliance with applicable regulatory/industry standards and codes, including the CBC and SDMC. Development of the proposed project would not compound or worsen potential geologic hazards. Geologic hazard conditions are site-specific and do not compound or increase in combination with projected development elsewhere. Therefore, cumulative impacts related to geologic hazards would be less than significant and not cumulatively considerable.

6.4 Greenhouse Gas Emissions

The impact analysis discussed in Section 5.4, *Greenhouse Gas Emissions*, is a cumulative analysis by its nature because GHG emissions are a cumulative issue caused by global GHG emissions and not an individual project. Cumulatively, there exists a significant impact related to GHG emissions at the global level. However, the proposed project's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable with the implementation of MM GHG-1 and MM GHG-2, which would ensure that the proposed project is consistent with the goals and strategies of the City's CAP.

6.5 Historical, Archaeological, and Tribal Cultural Resources

The Kearny Mesa Community Plan Update PEIR (City 2020d) indicates that individual future projects within the Kearny Mesa community may contribute to incremental historical resource impacts, and the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project; therefore, the baseline cumulative impact on historical resources is considered significant.

As stated in Section 5.5, *Historical, Archaeological, and Tribal Cultural Resources*, the proposed project would potentially result in significant impacts to historical resources. This is primarily associated with future improvements proposed under the project that would have the potential to affect unevaluated buildings and structures that will be 45 years of age at the time of the improvements. The private leasehold projects would also have the potential to affect such unevaluated buildings and structures at the Airport. Because these buildings and structures may be eligible at that time for listing in the NRHP, CRHR, and/or SDRHR and therefore potentially be considered historical resources, significant impacts have the potential to occur. However, implementation of mitigation measures MM HIST-1 and MM HIST-2 would ensure that improvements associated with the proposed project would conform to the Secretary of the Interior's Standards and would reduce potential impacts to below a level of significance. The project would therefore not contribute to the potentially significant cumulative impact related to historical resources.

The project would not have the potential to result in significant impacts to prehistoric and historic archaeological resources, sacred sites, or tribal cultural resources, and would therefore not contribute to a potentially significant cumulative impact related to these resources. Implementation of MM HIST-3 would ensure that the project would not result in a cumulatively considerable contribution related to impacts to human remains.

6.6 Human Health, Public Safety, and Hazardous Materials

As discussed in Section 5.6, *Human Health, Public Safety, and Hazardous Materials*, compliance with federal, state, regional, and local health and safety laws and regulations would address potential health and safety impacts. Potential health and safety impacts associated with wildfires, hazardous substances, emergency response and evacuation plans, and aircraft hazards would not combine to create cumulative impacts when viewed together with the potential growth that could occur within the surrounding communities of Kearny Mesa and Clairemont Mesa. Wildfire impacts would be limited based on the limited area within the communities mapped as a VHFHSZ according to CAL FIRE mapping. However, according to the City's proposed mapping, all but the developed central portion of the AMP area is within a VHFHSZ (City 2025). Future development or activity under the proposed project could therefore be at risk from exposure to wildland fires. Such development, however, would be subject to applicable state and City regulatory requirements related to fire hazards and prevention. Potential hazards associated with hazardous material sites are site-specific and would not combine with hazards in other areas to create a cumulative impact. Furthermore, development associated with the proposed project and private leasehold projects would be subject to safety compatibility and airspace protection criteria, as well as applicable sections of the SDMC. Also, the Kearny Mesa Community Plan Update PEIR did not identify cumulatively significant impacts related to human health and public safety. Therefore, cumulative impacts related to human health, public safety, and hazardous materials would be less than significant and not cumulatively considerable.

6.7 Hydrology and Water Quality

Improvements associated with the proposed project would be required to comply with applicable NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one

acre or more, or a Water Quality Control Plan if the disturbed area is less than one acre. Future development would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment. Further, the Kearny Mesa Community Plan Update PEIR did not identify cumulatively significant impacts related to hydrology. Therefore, cumulative impacts related to hydrology and water quality would be less than significant and not cumulatively considerable.

6.8 Land Use

The Kearny Mesa Community Plan Update PEIR (City 2020d) concluded that no significant cumulative impacts would occur related to land use because the Community Plan Update would be compatible with the General Plan policy framework and other applicable land use plans and regulations. Similarly, as discussed in Section 5.8, *Land Use*, the project is consistent with citywide zone classifications, in accordance with the goals of the General Plan and the regulations in the SDMC. The proposed project would continue to foster the existing land uses and pattern of growth at MYF. Development implemented in accordance with the project would not result in conflicts with the City's ESL Regulations or CAP. However, as discussed in Section 5.2 of this PEIR, the project could conflict with the MSCP SAP and the VPHCP for a single proposed improvement. Cumulative impacts associated with land use would therefore be potentially significant and cumulatively considerable.

6.9 Noise

The Kearny Mesa Community Plan Update PEIR (City 2020d) identified significant and unavoidable cumulative impacts associated with ambient noise increases, noise – land use compatibility, airport noise, construction noise, and vibration. Through implementation of mitigation measures MM NOI-1 through MM NOI-4, the project's contribution to operational stationary source noise impacts, construction noise impacts, and vibration impacts would not be cumulatively considerable. In addition, non-flight noise impacts associated with the implementation of the proposed project would generally be localized in nature. Noise from aircraft operations would not substantially change relative to future conditions without project implementation (refer to Figure 5.9-1). In fact, as noted in Section 5.9, *Noise*, implementation of the project would result in a reduction in the northwestern extent of the 65 CNEL contour (as well as the 70 CNEL contour) compared to future conditions without project implementation. This is a result of the removal of the Runway 28R displaced threshold, which would shift aircraft landing approaches to the east. While this shift would increase the southeastern extent of the 65 CNEL contour compared to future conditions without project implementation, this extension would be within the Airport property where there are no commercial, residential, or other NSLUs. Furthermore, land uses within the vicinity of the AMP area would be subject to the General Plan policies, ALUCP policies, noise ordinance requirements, and Title 24 standards discussed in this PEIR. Thus, the project's noise impacts would not be cumulatively considerable.

6.10 Public Services and Facilities

The Kearny Mesa Community Plan Update PEIR (City 2020d) identified significant and unavoidable cumulative impacts associated with public services. As discussed in Section 5.10, *Public Services*, however, implementation of the proposed project would not substantially increase the need for

fire/life safety services over existing conditions. In addition, the proposed AMP is in an area that charges impact fees to address cumulative impacts. Future improvements developed as part of the AMP would be required to contribute their fair share toward the cost of future facilities. Upon payment of applicable impact fees, the proposed project would have a less than cumulatively considerable impact on police and fire/life safety protection.

Implementation of the proposed project would not increase the population or result in the need for additional parks and recreation, schools, or library facilities that could result in physical changes to the environment. Therefore, the project would not contribute to cumulative impacts associated with schools, libraries, parks, or recreation.

6.11 Public Utilities

6.11.1 Water Supply

As discussed in Section 5.11, *Public Utilities*, the proposed project would be consistent with the water demand assumptions outlined in the City's UWMP. In addition, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve the projected demands of the AMP area, as well as existing and planned future water demand of the City. Further, the Kearny Mesa Community Plan Update PEIR did not identify cumulatively significant impacts related to water supply. Therefore, cumulative impacts related to water supply would be less than significant and not cumulatively considerable.

6.11.2 Utilities

The Airport is currently served by storm water, sewer, and water infrastructure, as well as various communication systems. The current capacity for all utilities is adequate for existing demands; however, capacity improvements may be required to serve projected future demands. Upgrades to water and sewer are administered by the PUD and are handled on a project-by-project basis. Upgrades to and maintenance of public storm water facilities or facilities granted and accepted via easement are administered by the City's Stormwater Department. Therefore, improvements associated with the proposed project, as well as other cumulative projects, would be reviewed by the City to determine any significant adverse effects to the City's storm water system, as well as any significant impacts associated with the installation of new storm water infrastructure, and these significant impacts would be avoided. Therefore, the project would not contribute to cumulative impacts associated with utilities.

6.11.3 Solid Waste Management

The proposed project would generate solid waste through demolition/construction activities and ongoing operations that would increase the amount of solid waste generated within the region. However, the proposed project, as well as other cumulative projects, would be required to comply with the SDMC and General Plan policies promoting waste diversion to preserve the City's solid waste capacity. If demolition/construction activities generate 60 tons of waste or more, improvements associated with the project would be required pursuant to the City's CEQA

Significance Determination Thresholds (City 2022a) to develop and implement a WMP targeting 75 percent waste diversion. Further, the Airport would implement a Solid Waste Reduction Plan to ensure that activities would contribute to meeting the City's goals for solid waste reduction. Therefore, cumulative solid waste management impacts would be less than significant and not cumulatively considerable.

6.12 Transportation

The Kearny Mesa Community Plan Update PEIR (City 2020d) identified significant and unavoidable cumulative impacts associated with VMT. The proposed project, however, would not generate VMT that would exceed thresholds in the City TSM, and would therefore not result in a cumulatively considerable contribution. Similarly, the project would not generate vehicular traffic in a manner that would contribute to cumulative impacts related to conflict with plans, traffic hazards, or emergency access.

6.13 Visual Effects and Neighborhood Character

The Kearny Mesa Community Plan Update PEIR (City 2020d) identified significant and unavoidable cumulative impacts associated with neighborhood character that would occur from the shift in character in Kearny Mesa from a predominantly lower density, commercial and industrial employment center to also include higher density, mixed-use urban village and employment hub, which would substantially alter the existing neighborhood character of Kearny Mesa as it is built out. The public and private development within the AMP would result in improvements, modifications, and reconfigurations of existing MYF land uses. No new uses would be introduced, although some new buildings would be constructed. All development associated with the AMP would take place within the existing footprint that supports aviation land uses, apart from an encroachment into the hotel leasehold on the southwest side. The AMP would allow for the continuation of the existing land uses to meet FAA design requirements and projected demand. Therefore, the project would not result in a cumulatively considerable contribution to the significant cumulative impact.

Cumulative impacts associated with scenic vistas, landform alteration, light and glare, and landmark trees would be less than significant consistent with the conclusions in the Kearny Mesa Community Plan Update PEIR.

7.0 OTHER MANDATORY DISCUSSION AREAS

This section of the PEIR presents a summary of growth-inducing impacts, effects found not to be significant, significant and unavoidable impacts, and significant irreversible environmental changes that could result from implementation of the project. These findings are based in part on the analysis provided in Chapter 5, *Environmental Analysis*.

7.1 Growth Inducement

Section 15126.2(d) of the CEQA Guidelines requires that EIRs include an evaluation of potential growth inducement impacts to “Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” This can include projects that remove obstacles to population growth, such as through the provision of expanded public utility capacity that may allow additional construction in the associated service area (e.g., the major expansion of a wastewater treatment plant). The referenced CEQA Guidelines section also notes that “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

The City’s CEQA Significance Determination Thresholds (City 2022a) provide additional direction on this issue, noting that growth inducement:

...is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly which may result in the construction of major and new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment.

The City’s Significance Determination Thresholds (City 2022a) also state that “the analysis must avoid speculation and focus on probable growth patterns or projects.” The proposed AMP is a decision-making tool intended to complement other local and regional plans to provide a strategic development plan based on forecasted Airport activity within the 20-year planning period (through 2037). Implementation of the proposed AMP would address current airside facility safety and configuration concerns and provide required facility and infrastructure upgrades to the Airport to accommodate projected Airport demand. Because the AMP is proposed in response to projected growth and demand, it would not promote or encourage economic or population growth. In addition, the proposed AMP would not introduce new housing or otherwise directly result in population growth.

7.2 Effects Found Not to be Significant

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and therefore were not discussed in detail in the EIR. The impacts associated with the following environmental

issue areas were found to not be significant as a result of the proposed project: Agriculture and Forestry Resources; Energy; Mineral Resources; Paleontological Resources; Population and Housing; and Wildfire.

7.2.1 Agriculture and Forestry Resources

Based on farmland mapping prepared by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (DOC 2022), the Airport area is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Land within the AMP area is classified as either Urban and Built-up Land or Other Land, which applies to vacant and non-agricultural land surrounded on all sides by urban development that is greater than 40 acres in size. In addition, there is no forestland within the Airport or immediate vicinity that would conflict with the proposed project. Therefore, the project would not result in the loss or conversion of farmland or forestland. No impact to agricultural or forestry resources would occur.

7.2.2 Energy

During construction of future airport improvements associated with the project, there would be a temporary consumption of energy resources required for the operation of off-road equipment and on-road vehicles; however, the duration would be limited due to the phasing of construction, and the area of construction is minimal. Compliance with local, state, and federal regulations (e.g., limit engine idling times, require the recycling of construction debris, etc.) would reduce short-term energy demand during construction to the extent feasible, and construction would not result in a wasteful or inefficient use of energy. Construction equipment energy consumption would be typical of similar projects requiring the use of gasoline or diesel. There are no known conditions associated with project that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, the project would not result in the use of wasteful amounts of fuel or other forms of energy during construction. Impacts would be less than significant.

Buildings and hangars constructed under the proposed project would be required to use electricity to run various fixtures and equipment. During operation, there are no unusual characteristics or processes that would require the use of equipment that would be more energy intensive than is currently used, or the use of equipment that would not conform to current emissions standards and related fuel efficiencies. Furthermore, through compliance with applicable regulations (e.g., CCR Title 24 Standards), as well as the City's CAP, individual improvements implemented under the proposed project would be consistent with state and local energy reduction policies and strategies and would not consume energy resources in a wasteful or inefficient manner. There are no improvements associated with the project that would support the use of excessive amounts of energy or would create unnecessary energy waste. Impacts would be less than significant.

7.2.3 Mineral Resources

According to the California Geological Survey (CGS) Special Report 240 (CGS 2017), areas classified as Mineral Resource Zone 1, 2, 3, and 4 (MRZ-1 through MRZ-4) have been mapped for the City of San Diego. These categories are described as follows:

- **MRZ-1:** Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or areas where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3:** Areas containing mineral occurrences of undetermined mineral resource significance.
- **MRZ-4:** Areas where available information is inadequate for assignment to any other MRZ category.

Most of the AMP area is classified as MRZ-3, with areas in the eastern portion of the Airport mapped as MRZ-2 (CGS 2017); however, the Airport is located within a developed urban area and no mineral extraction/production uses currently exist within the AMP boundaries or the surrounding areas. Land within the AMP area with an MRZ-2 classification is undeveloped and would continue to be undeveloped under the proposed project. Implementation of the project would not affect or result in the loss of identified mineral resources, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a local or general plan. Therefore, no impact to mineral resources would occur.

7.2.4 Paleontological Resources

Paleontological resources, or fossils, are the buried remains or traces of prehistoric organisms. The potential for paleontological resource at a location can be predicted through previous correlations that have been established between fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resources sensitivity of particular formations make it possible to predict where fossils may or may not be encountered. This analysis is based on a review of the Geologic Map of the San Diego Quadrangle (Kennedy and Tan 2008) and the City's CEQA Significance Determination Thresholds (City 2022a).

Underlying geologic formations within the Airport area include artificial fill, very old paralic deposits, and Stadium Conglomerate (refer to Figure 2-9). The Mission Valley Formation and Stadium Conglomerate are characterized with a high paleontological resource sensitivity rating, and the very old paralic deposits are characterized with a moderate paleontological resource sensitivity rating. Artificial fill is considered to have no potential for paleontological resources.

There are no known fossil collection localities that occur within the boundaries of the Airport. The nearest known fossil collection locality is across Aero Drive at the Serra Mesa Library. This locality is from the Eocene-age Mission Valley Formation (San Diego Natural History Museum 2018).

Future improvements implemented under the proposed project that require grading or excavation into underlying geologic formations with moderate to high paleontological potential could expose and destroy paleontological resources if the fossil remains are not recovered and salvaged. Grading

and excavation activities associated with future development under the proposed project would occur within portions of the AMP area underlain by very old paralac deposits. The project would therefore not result in earthwork greater than 1,000 cubic yards in quantity extending to a depth of 10 feet or greater into high sensitivity paleontological geological units, such as the Mission Valley Formation and Stadium Conglomerate. However, the project could potentially result in earthwork greater than 2,000 cubic yards in quantity within moderate sensitivity paleontological geological units, such as very old paralac deposits.

Pursuant to SDMC Section 142.0151, all future development is required to screen for grading quantities and geologic formation sensitivity and apply the appropriate requirements for paleontological monitoring. Paleontological monitoring is required for grading that extends 10 feet or greater in depth and involves 1,000 cubic yards or more within high sensitivity paleontological geological units and/or 2,000 cubic yards or more within moderate sensitivity paleontological geological units, grading on a fossil recovery site, or grading within 100 feet of the mapped location of a fossil recovery site. Regulatory compliance for future discretionary projects reviewed in accordance with CEQA would be assured through permit conditions, when applicable or as notes on plans, and would be adequate to preclude impacts to paleontological resources. Implementation of the General Grading Guidelines for Paleontological Resources, as required by SDMC Section 142.0151, would ensure that impacts to paleontological resources would be less than significant.

7.2.5 Population and Housing

No housing currently exists within the AMP area and the project would not introduce new housing uses. As such, the project would not generate population growth nor would it displace people or existing housing. Therefore, no impact to population and housing would occur.

7.2.6 Wildfire

According to CAL FIRE mapping, the Airport is not located within a VHFHSZ, though the eastern portion of the AMP area is mapped as within a Moderate Fire Hazard Severity Zone (CAL FIRE 2025). However, according to the City's proposed mapping, all but the developed central portion of the AMP area is within a VHFHSZ (City 2025). Future development or activity under the proposed project could therefore be at risk from exposure to wildland fires. Such development, however, would be subject to applicable state and City regulatory requirements related to fire hazards and prevention. Specifically, these encompass standards associated with vegetative (brush) management, such as selective removal/thinning and fire-resistant plantings to create appropriate buffer zones around development, as well as incorporating applicable fire-related design elements, including fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. These requirements would be implemented as part of individual improvements associated with the project. Overall, the improvements proposed under the project would not substantially increase the risk of wildland fires at the Airport over existing conditions based on the similarity of the proposed uses to existing uses. In addition, the AMP area would continue to be serviced by SDFD Station 28, which is located adjacent to the Airport on Kearny Villa Road. Therefore, impacts associated with wildfire hazards would be less than significant.

7.3 Unavoidable Significant Environmental Impacts

In accordance with CEQA Guidelines Section 15126.2(c), an EIR must discuss any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance. Chapter 5 identifies significant and unavoidable direct and cumulative impacts related to the following:

- Biological Resources (conservation planning)
- Land Use (consistency with the MSCP SAP and VPHCP)

All other potentially significant impacts identified in Chapter 5 can be reduced to below a level of significance through regulatory compliance or implementation of the mitigation framework.

7.4 Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes which would occur should the project be implemented. Irreversible changes typically fall into three categories:

- Primary impacts such as the use of non-renewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);
- Secondary impacts such as highway improvements which provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with future development under the project.

7.4.1 Primary Impacts Related to Nonrenewable Resources

Section 15126.2(d) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to ensure that the current consumption of such resources is justified. Sensitive biological resources are located within the AMP area. Direct and indirect impacts to such resources can be avoided or compensated for through implementation of mitigation and through regulatory compliance. Although a potentially significant and unavoidable impact is identified related to conflict with the MHPA, this represents a land use inconsistency rather than a direct impact on resources. The habitat removed in association with development in the MHPA would be mitigated (i.e., replaced) at ratios specified in mitigation measure MM BIO-8. As discussed in Section 7.2, implementation of the project would not impact agricultural, forestry, or mineral resources. Implementation of the project would not directly impact nearby water bodies, as discussed in Section 5.7, *Hydrology and Water Quality*.

Construction implemented as part of the project would require the irreversible consumption of natural resources and energy. Natural resource consumption could include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials are considered permanently consumed. Energy derived from nonrenewable sources, such as fossil fuels, would be consumed during construction and as a result of operational lighting, equipment,

and transportation uses. The proposed project includes measures aimed at improving energy efficiency, reducing water use, and minimizing impacts on other natural resources to reduce irreversible energy and water consumption associated with construction and operation.

The proposed project could impact important historical resources, given the presence of known and potential historical resources within the AMP area. Potential impacts to historical resources can be mitigated through regulatory compliance and the implementation of the mitigation framework detailed in Section 5.5, *Historical, Archaeological, and Tribal Cultural Resources*. Impacts to historical resources would be less than significant with mitigation incorporated.

7.4.2 Secondary Impacts Related to Access to Previously Inaccessible Areas

The area surrounding the Airport is built out and is accessible via existing regional and local transportation facilities (e.g., I-805, I-15, SR 163, Aero Drive, Kearny Villa Road, Balboa Avenue). No new freeways or roadways are proposed as part of the project that would provide access to currently inaccessible areas. Therefore, implementation of the proposed project would not result in a significant irreversible commitment with regard to providing access to previously inaccessible areas.

7.4.3 Impacts Related to Environmental Accidents

With respect to environmental accidents, and as further discussed in Section 5.6 of this PEIR, *Human Health, Public Safety, and Hazardous Materials*, potential impacts related to hazardous materials and associated health hazards from the implementation of the proposed project would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standards and the previously identified mitigation measures. Although the Airport is not located within a VHFHSZ according to CAL FIRE mapping (CAL FIRE 2025), according to the City's proposed mapping, all but the developed central portion of the AMP area is within a VHFHSZ (City 2025) and future development or activity under the proposed project could be at risk from exposure to wildland fires. Such development, however, would be subject to applicable state and City regulatory requirements related to fire hazards and prevention. Accidents related to flood hazards would not be significant because all development would be subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual.

8.0 ALTERNATIVES

8.1 Introduction

CEQA Guidelines Section 15126.6 requires that an EIR compare the effects of a “reasonable range of alternatives” to the effects of a project. The CEQA Guidelines further specify that the alternatives evaluated should attain most of the basic project objectives and avoid or substantially lessen any significant effects of the project. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). The impacts of the alternatives may be discussed “in less detail than the significant effects of the project as proposed” but must provide sufficient information to allow meaningful evaluation, analysis, and comparison of each alternative. The discussion must also include an evaluation of the No Project Alternative to allow decision makers to compare the impacts of approving the proposed project against the impacts of not approving it. The CEQA Guidelines also require the identification of the environmentally superior alternative among the alternatives analyzed.

8.2 Summary of Project Objectives and Significant Effects

In accordance with CEQA Guidelines Section 15126.6(a), the project alternatives are assessed relative to their ability to (1) meet the basic objectives of the project and (2) avoid or substantially lessen the significant effects of the project.

8.2.1 Airport Master Plan Objectives

As described in Section 3.3, *Airport Master Plan Objectives*, the primary goals, recommendations, and objectives of the project are as follows:

1. Implement safety improvements necessary to bring the Airport into compliance with FAA regulations and design criteria.
2. Adapt to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and Airport land use policies.
3. Accommodate regional demand for hangar, tie-down, and terminal building space utilizing a phased implementation schedule for the proposed improvements.
4. Maintain a balance between the Airport users and the surrounding community while encouraging Airport business growth and opportunities.
5. Preserve natural and historic resources within Airport lands.

8.2.2 Significant Impacts of the Proposed Project

Based on the evaluations in Chapter 5.0, *Environmental Analysis*, implementation of the project was determined to result in potentially significant impacts related to the environmental resources areas discussed below.

Development of the improvements as part of the implementation of the project would result in potentially significant direct and indirect impacts to sensitive plant and animal species, as discussed in Section 5.2, *Biological Resources*. Species potentially affected include San Diego mesa mint, San Diego fairy shrimp, coastal California gnatcatcher, BUOW, Crotch's bumble bee, and nesting birds. Implementation of the project would result in direct impacts to 25.7 acres of sensitive vegetation communities, composed of 0.54 acre of vernal pool, 0.5 acre of sage scrub, less than 0.1 acre of baccharis scrub, less than 0.1 acre of chamise chaparral, and 24.7 acres of non-native grassland. These impacts would require mitigation at ratios prescribed by the City's Biology Guidelines.

The project would involve the development of incompatible uses with the MHPA and would therefore conflict with the VPHCP and MSCP SAP. Because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies in accordance with MM BIO-9, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

While the currently proposed project does not anticipate any changes or alterations to Buildings 6, 7, and 8, which are considered historical resources, any unplanned maintenance, repairs, or stabilization to these hangars would have the potential to cause a substantial adverse change in the historic significance of the hangars. As such, impacts are considered potentially significant. Future improvements under the project would have the potential to affect other, unevaluated buildings and structures that will be 45 years of age at the time of the improvements. Because these buildings and structures may be eligible at that time for listing in the NRHP, CRHR, and/or SDRHR and therefore potentially considered historical resources, impacts are considered potentially significant, as discussed in Section 5.5, *Historical, Archaeological, and Tribal Cultural Resources*. No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be disturbed as a result of the project. However, the inadvertent discovery of human remains during ground-disturbing activities remains a possibility. As such, impacts are considered potentially significant and require the incorporation of mitigation measures to reduce the impact to a less than significant level.

As discussed in Section 5.4, *Greenhouse Gases*, without requiring all new or renovated project buildings to be all electric and requiring a 75 percent construction and demolition debris diversion rate, the project would be inconsistent with the City's 2022 CAP requirements for infrastructure projects. Therefore, the impact associated with GHGs would be potentially significant and would require mitigation to reduce the impact to a less than significant level.

Future development under the project would be required to adhere to applicable regulatory/industry codes, standards, and requirements related to health hazards from hazardous materials sites, as described in Section 5.6, *Human Health, Public Safety, and Hazardous Materials*. However, although compliance with existing regulations would minimize impacts associated with hazardous materials, impacts remain potentially significant due to the areas of potential

environmental concern identified within the project area due to past and present hazardous materials use within the Airport and mitigation would be required to reduce the impact to a less than significant level.

As discussed in Section 5.8, *Land Use*, the project would have a potentially significant impact associated with a conflict with applicable land use plans that would be reduced to a less than significant level with the incorporation of mitigation. However, because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies in accordance with MM BIO-9, the project would not be consistent with the MSCP SAP and VPHCP, and impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

The specific uses associated with the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road are yet to be determined; therefore, there is the potential that noise levels generated by these uses could exceed property line noise limits, and impacts are conservatively considered potentially significant. Due to the sensitivity to vibration of the historic buildings within the project area, particularly the historic hangars, potential structural damage could potentially occur during construction activities in the project area, as described in Section 5.9, *Noise*. Therefore, impacts would be potentially significant and require mitigation.

8.3 Alternatives Screening Process

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify alternatives that were considered and rejected as infeasible and briefly explain the reasons for their rejection. This section addresses that requirement by providing a summary of the alternatives screening process that has been undertaken for the project.

The initial step in preparing the AMP was identifying aviation demand forecasts at MYF. Demand forecasts, based on the desires and needs of the service area, provide a basis for determining the type, size, and timing of aviation facility development and a platform upon which the AMP is based. Forecasts for MYF's future aviation activity and demand were developed for a planning period extending through 2037 using various data sources provided by, but not limited to, the FAA, Caltrans, the County of San Diego, and the City of San Diego. The demand forecast developed in the AMP and carried forward as the basis for the AMP is the 5-Year MYF Operations Trend. This scenario looked at the previous five years of operations at MYF and extrapolated a growth rate which was then applied over the 20-year planning period. Five other scenarios were considered that looked at various factors such as FAA forecasts, regional forecasts, and the previous master plan. The 5-Year forecast was found to be reasonable and fell within the outer limits of the other scenarios. For this reason, it was selected as the preferred operations forecast.

Section 5 of the Final AMP (C&S Engineers 2019) included an assessment of alternatives to satisfy the forecasted demand (5-Year MYF Operations Trend) at the Airport. The overall objective of the alternatives assessment in the AMP was to evaluate the best ways to implement the necessary facility requirements to safely and effectively meet FAA safety, capacity, and design standards and accommodate projected aviation demand over the planning period.

To ensure that the FAA safety, capacity, and design standards would be met, airside alternatives were developed separately from landside alternatives. Four alternative scenarios were developed for the landside components of the Airport, and four scenarios were included for the airside components. These initial draft alternative scenarios were presented to the Airport Master Plan Planning Advisory Committee (PAC) and the public for input and comment. The collection and interpretation of input gathered from the PAC and the public ultimately indicated that no single proposed alternative contained all the preferred airside and landside components desired by the PAC and the public. As such, adjustments were made to each proposed alternative scenario. Next, evaluation criteria were created using guidance found in FAA's AC 150/5070-6B, Airport Master Plans, to rate each alternative, with the goal of identifying a recommended airside and landside alternative. Based on the outcome of the evaluation and ranking process, a preferred airside and landside alternative scenario emerged. The preferred airside and landside scenarios were then combined into one recommended preferred development alternative for the Airport.

The preferred alternative described in the AMP was further refined as part of the development process. Changes from the project compared to what was included in the initial scoping process include a removal of 31 tie-downs, wash racks, and the self-service island. The terminal building expansion increased from 6,000 SF to 6,400 SF. Taxiways D and M are to remain, and the 4-acre area adjacent to Aero Drive will remain as Aeronautical use instead of changing to a non-Aeronautical use. Further, as noted in Chapter 3.0, *Project Description*, unleaded aviation gasoline became available at the Airport in 2024. The City recognized the need for a more environmentally friendly fuel option and endeavored to make UL94 available at MYF and therefore the AMP now includes a proposed unleaded avgas fuel tank.

8.4 Proposed Airport Master Plan Alternatives

Based on the alternatives screening process discussed above in Section 8.3, the following four alternatives are evaluated in this analysis:

- Alternative 1: No Project (No Airside or Landside Improvements)
- Alternative 2: Existing 2008 ALP
- Alternative 3: Reduced Project (No Removal of Runway 28R Displaced Threshold)
- Alternative 4: Wetlands Avoidance Alternative

These alternatives represent a reasonable range of alternatives, as defined in the State CEQA Guidelines, because they provide a feasible alternate infrastructure that would reduce and/or eliminate significant impacts associated with the project.

8.5 No Project (No Airside or Landside Improvements)

8.5.1 Description

The State CEQA Guidelines require that the analysis of a No Project Alternative be included in all EIRs. The purpose of evaluating the No Project Alternative is to provide a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives. The

No Project Alternative represents what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved.

For the purposes of this analysis, the No Project Alternative would not implement any airside or landside improvements that are part of the proposed project, outside of any standard improvements needed for maintenance. The existing Runway 28R and Runway 5 displaced thresholds would remain intact, and none of the airside improvements, including removal of pavement at the end of Runway 5 and Taxiway F, reconfiguration of several taxiways, and construction of new run-up areas would occur.

In addition, the proposed landside improvements, including the expansion of the Terminal Building, construction of 92 hangars, 48 tie-down areas, public viewing area, and unleaded avgas fuel tank would not occur.

8.5.2 Environmental Analysis

8.5.2.1 Air Quality

Under the No Project Alternative, none of the airside or landside improvements associated with the project would occur. Therefore, the No Project Alternative would not generate construction-related or non-aircraft-related operational criteria air pollutant emissions (beyond existing conditions and those associated with standard maintenance activities), which is a reduction in impacts compared to the proposed project. However, criteria air pollutant emissions and toxic air contaminants associated with aircraft flights would still occur, since operations would increase even without the project, and therefore aircraft-related operational emissions would be similar to the project and would be less than significant. There would be no impacts related to conflicts with an air quality plan or odors, reduced from the project, which has less than significant impacts.

8.5.2.2 Biological Resources

The No Project Alternative would not result in direct or indirect impacts to sensitive plant and animal species since there would be no ground disturbance other than standard maintenance. The No Project Alternative would avoid impacts to sensitive vegetation communities, avoiding the project-related impacts to 25.7 acres of sensitive vegetation communities.

Under the No Project Alternative, no action would be taken within MHPA portions of the Airport site. The 0.54 of vernal pool within the MHPA that would be disturbed by the proposed project would not occur.

Therefore, the No Project Alternative would have no impact to biological resources, which reflects a reduced impact compared to the proposed project.

8.5.2.3 Geology and Soils

The No Project Alternative would not include any airside or landside improvements. Comparatively, the project would introduce several new structures to MYF during the 20-year planning period,

including an expanded terminal building and hangars. New structures would be designed to meet the most current standards of the SDMC and the CBC.

Therefore, the No Project Alternative would have no impact to geology and soils, which is a reduced impact compared to the project.

8.5.2.4 Greenhouse Gas Emissions

Under the No Project Alternative, none of the airside or landside improvements associated with the project would occur. Therefore, the No Project Alternative would not generate construction-related or non-aircraft-related operational GHG emissions (beyond existing conditions and those associated with maintenance activities), which is a reduction in impacts compared to the proposed project. However, GHG emissions associated with aircraft flights would still occur, since operations would increase even without the project, and therefore aircraft-related operations emissions would be similar to the project.

8.5.2.5 Historical, Archaeological, and Tribal Cultural Resources

While the currently proposed project does not anticipate any changes or alterations to Buildings 6, 7, and 8, which are considered historical resources, any unplanned maintenance, repairs, or stabilization to these hangars would have the potential to cause a substantial adverse change in the historic significance of the hangars. This would also apply to the No Project Alternative. Therefore, impacts associated with historical resources would be potentially significant under the No Project Alternative.

Further, the No Project Alternative may still implement maintenance, repairs, or stabilization if needed to other, unevaluated buildings and structures that will be 45 years of age. Because these buildings and structures may be eligible at that time for listing in the NRHP, CRHR, and/or SDRHR they may potentially be considered historical resources, and impacts would be considered potentially significant, similar to the proposed project.

No previously recorded archaeological resources and no known burial sites or cemeteries exist within the Airport site and it is not expected that human remains would be disturbed as a result of the No Project Alternative. Therefore, impacts would be less than significant and reduced compared to the proposed project, which requires mitigation to address unintentional disturbances of human remains.

8.5.2.6 Human Health, Public Safety, and Hazardous Materials

Even though the No Project Alternative would not construct new facilities or implement improvements, the day-to-day operation of the Airport would still involve the use of hazardous materials and disposal of hazardous wastes.

Relative to the project, the No Project Alternative would avoid the potential exposure of contaminants from soil disturbance during construction that may expose workers and the public, and impacts would be less than significant, a reduced impact compared to the project, which requires mitigation to minimize risks.

Risks associated with wildfire, emergency response, and aircraft hazards would be less than significant, similar to the proposed project.

8.5.2.7 Hydrology and Water Quality

Under the No Project Alternative, the Airport would generally maintain the existing hydrological patterns in which the impervious surfaces in the southern and central portions of the site would continue to be conveyed to gutters and storm drains, and the northern and western undeveloped portions of the site would continue to percolate into the pervious soils. This differs from the project, which would result in an increase in impervious surfaces within the AMP area, altering the drainage pattern and increasing the rate and amount of surface runoff above existing conditions. Similarly, the extent of ground disturbance and associated potential effects to water quality associated with construction would not occur, resulting in reduced impacts compared to the project. Therefore, the No Project alternative would have no impacts associated with hydrology and water quality, which is a reduced impact related compared to the proposed project.

8.5.2.8 Land Use

Under the No Project Alternative, the unavoidably significant impact associated with consistency with the MSCP SAP and VPHCP would be avoided, reducing impacts as compared to the proposed project. Other impacts, such as those related to community division and consistency with the ALUCP, would be similar to the proposed project (no significant impact).

8.5.2.9 Noise

Under the No Project Alternative, none of the airside or landside improvements associated with the project would occur. Correspondingly, the noise generated during construction or non-flight-related operational activities related to the implementation of the proposed project would be avoided. Therefore, although the proposed project would result in less than significant impacts associated with noise, the No Project Alternative would have a reduced impact related to construction noise.

Noise generated from flight-related operational activities would be similar compared to the project since the projected number of operations would be the same. However, the No Project Alternative would not include the removal of the displaced threshold. As shown in Figure 5.9-2, *Future Montgomery-Gibbs Executive Airport Noise Contours With and Without AMP Implementation*, implementation of the project would result in a reduction in the northwestern extent of the 65 CNEL contour compared to future conditions without removal of the Runway 28R displaced threshold, which would shift aircraft landing approaches to the east, away from developed areas. Therefore, the No Project Alternative would result in greater impacts related to aircraft noise compared to the project, though impacts would be less than significant.

Similarly, the No Project Alternative would avoid potential impacts related to construction vibration that may affect historic structures, and mitigation associated with the project would not be required. Overall, impacts would be reduced compared to the proposed project.

The specific uses associated with the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road are yet to be determined; however, under the No Project Alternative, no development would be constructed in that area, and impacts related to operational noise would be less than

significant, which is a reduced impact compared to the project, which requires mitigation for development of that area.

8.5.2.10 Public Services

The No Project Alternative would not result in the airport improvements identified in the project. Given that under the No Project Alternative the demand for public services would remain unchanged from present conditions and that with the implementation of improvements associated with the project would not occur, the No Project Alternative would have no impact in relation to public services, resulting in a reduced impact compared to the proposed project.

8.5.2.11 Utilities

The No Project Alternative would not result in the airport improvements identified in the proposed project. As such, under the No Project Alternative, the land uses and operations at the Airport would remain generally unchanged, and no impact related to utilities would occur. Impacts under the No Project Alternative would be reduced compared to the proposed project.

8.5.2.12 Transportation

The No Project Alternative would not result in the airport improvements identified in the proposed project. As such, under the No Project Alternative, the land uses and operations at the Airport would remain generally unchanged, and the 151 daily trips associated with the proposed project would not occur. There would be no impacts associated with VMT, traffic hazards, or emergency access. Therefore, the No Project Alternative would have no impact associated with Transportation, which is reduced compared to the proposed project, which would have less than significant impacts.

8.5.2.13 Visual Effects and Neighborhood Character

The No Project Alternative would not result in the airport improvements identified in the proposed project, including those such as the construction of the hangars, tie-downs, expansion of the terminal building, and MALSR, which would represent visible permanent above-ground components. Therefore, although the proposed project would have less than significant impacts with relation to visual effects and neighborhood character, the No Project Alternative would have a reduced impact compared to the proposed project.

8.5.3 Conclusion

Under the No Project Alternative, several environmental impacts would be reduced in comparison to the proposed project because none of the airside or landside improvements would occur. Mitigation associated with construction vibration, hazardous materials, GHGs, operational noise, and biological resources would no longer be required under the No Project Alternative. Significant and unavoidable biological resource and land use impacts to the VPHCP and MHPA would be avoided. However, impacts associated with historic resources would still require mitigation. In addition, the 65 CNEL noise contour related to aircraft operations would extend further to the northeast compared to the proposed project.

The No Project Alternative would not implement the airside improvements associated with the project, including the planned hold bay at Taxiway A and installation of additional MALSR lighting. These features would provide greater safety, reduce the incidence of runway incursions, and are needed to accommodate the increasing demand for flights in the region. Without these and other airside improvements, the No Project Alternative would not fulfill **Objective 1: Implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria.** The following objectives would also not be fulfilled: **Objective 2: Adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies;** **Objective 3: Accommodating regional demand for hangar, tie-down, and terminal space;** or **Objective 4: Maintaining a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities.**

By not implementing airside improvements that would affect sensitive biological resources, the No Project Alternative would fulfill **Objective 5: Preserving natural and historic resources within Airport lands.**

8.6 Existing 2008 ALP

8.6.1 Description

Under the Existing 2008 ALP Alternative, as updated by Kimley-Horn in 2014 (Kimley-Horn 2014), development would occur as guided by the most recently approved ALP for MYF, which was approved by the FAA in 2008. Planned improvements in the 2008 ALP include redevelopment in the western area with new General Aviation facilities, which would involve demolition of the historic large box hangars and aircraft parking. Other improvements include rehabilitation of Runway 5/23, rehabilitation of Taxiways A, B, C, D, H, K, relocation of Runway 5 threshold, and demolition of a portion of Taxiway G and construction of Taxiway G1 in a new location.

8.6.2 Environmental Analysis

8.6.2.1 Air Quality

The 2008 ALP Alternative would result in fewer improvements and a smaller amount of construction disturbance compared to the project. Future aircraft operations would be similar to the proposed project, as flights would increase with or without implementation of the project. Criteria pollutant and precursor pollutant emissions generated during construction or operational activities under the 2008 ALP Alternative would be less than significant. Therefore, although the proposed project would result in less than significant impacts associated with air quality, the 2008 ALP Alternative would have a reduced impact due to the reduced number of improvements that would be constructed.

8.6.2.2 Biological Resources

The 2008 ALP Alternative would not avoid total disturbance to sensitive habitats, including the MHPA area that is north of the hotel and near the runup areas. However, since the 2008 ALP would not include removal of the Runway 28R displaced threshold, it would avoid the significant and

unavoidable impact to the VPHCP and MHPA associated with the project. Therefore, the 2008 ALP Alternative would result in reduced impacts to biological resources compared to the project, although mitigation would still be required.

8.6.2.3 Geology and Soils

While construction of improvements from the 2008 ALP could result in similar geology and soils impacts as the proposed project, potential impacts would be reduced compared to the proposed project based on the scale of the improvements. Impacts would remain less than significant, similar to the proposed project.

8.6.2.4 Greenhouse Gas Emissions

While construction of the airside improvements from the 2008 ALP could result in similar emissions of GHGs as the proposed project, potential impacts would be reduced based on the scale of the improvements. Further, the 2008 ALP would not include the landside improvements included as part of the proposed project, such as the construction of hangars and the expansion of the terminal building, and therefore mitigation to ensure consistency with the City's CAP would not be required. Therefore, GHG impacts would be reduced compared to the proposed project and would be less than significant.

8.6.2.5 Historical, Archeological, and Tribal Cultural Resources

MYF contains many structures of varying ages. Of these structures, there are three hangars on the western edge of the MYF property (see Figure 2-11, *Historic Resources*, of this PEIR) that are considered significant historic resources under CEQA and are eligible for listing on the NRHP, CRHR, and SDRHR. As shown in the 2008 ALP, these three structures are slated for demolition as part of the aviation redevelopment area.

In relation to prehistoric and historic archaeological resources and tribal cultural resources, both the 2008 ALP Alternative and the project would result in ground disturbance within the footprint of MYF associated with the airside improvements. The archaeological sensitivity of MYF is considered low (see Section 5.6 of this PEIR) and recent searches of the Sacred Land Files and tribal consultation associated with the project did not identify any resources. The 2008 ALP Alternative and the project would have similar less than significant impacts upon historic and prehistoric archaeological resources and tribal cultural resources.

Since the 2008 ALP Alternative includes the demolition of three hangars that are considered historically significant under CEQA, impacts would be significant and unmitigable. Impacts would be greater than the project, which would retain those structures.

8.6.2.6 Human Health, Public Safety, and Hazardous Materials

The 2008 ALP Alternative would use hazardous materials and dispose of hazardous waste associated with the construction of improvements and operation of the Airport similar to the proposed project, albeit to a lesser extent based on the reduced scale of improvements. Construction of improvements from the 2008 ALP could result in similar hazardous materials site

risks of exposure as the proposed project. For example, due to the age of the hangars in the west area of the Airport, potentially hazardous materials such as lead and asbestos have the potential of being released, resulting in potentially significant impacts and requiring mitigation. Therefore, the 2008 ALP would result in potentially significant impacts associated with human health, public safety, and hazardous materials that would be reduced to less than significant with mitigation incorporated, similar to the proposed project.

8.6.2.7 Hydrology and Water Quality

Construction of improvements from the 2008 ALP that have not yet been implemented could result in similar hydrology and water quality impacts as the proposed project; however, potential impacts associated with the 2008 ALP would be reduced compared to those associated with the proposed project based on the scale of improvements. Specifically, under the 2008 ALP Alternative, the Airport would generally maintain the existing hydrological patterns in which the impervious surfaces in the southwestern portions of the site would continue to be conveyed to gutters and storm drains. This differs from the project, which would result in an increase in impervious surfaces in that area due to the construction of the hangars, tie downs, and parking spaces, altering the drainage pattern and increasing the rate and amount of surface runoff above existing conditions. Similarly, the extent of ground disturbance and associated potential effects to water quality during the construction of improvements under the 2008 ALP would be reduced compared to the project. Therefore, although the 2008 ALP would result in less than significant impacts associated with hydrology and water quality, the impact would be reduced impact due to the reduced number of improvements compared to the project.

8.6.2.8 Land Use

Under the No Project Alternative, the unavoidably significant impact associated with consistency with the MSCP SAP and VPHCP would be avoided, reducing impacts as compared to the proposed project. Other impacts, such as those related to community division and consistency with the ALUCP, would be similar to the proposed project (no significant impact).

8.6.2.9 Noise

The 2008 ALP Alternative would include some airside improvements, but the landside improvements proposed as part of the project would not occur. While noise could still occur from the construction of airside improvements from the 2008 ALP that have not yet been implemented, impacts would be reduced compared with the proposed project based on the scale of improvements.

Similar to the proposed project, the specific uses associated with the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road are yet to be determined; therefore, there is the potential that noise levels could exceed property line noise limits, and impacts would be conservatively considered potentially significant.

Noise generated from flight-related operational activities would be similar compared to the project since the projected number of operations would be the same. However, the 2008 ALP Alternative would not include the removal of the displaced threshold. As shown in Figure 5.9-2, *Future Montgomery-Gibbs Executive Airport Noise Contours With and Without AMP Implementation*,

implementation of the project would result in a reduction in the northwestern extent of the 65 CNEL contour compared to future conditions without removal of the Runway 28R displaced threshold, which would shift aircraft landing approaches to the east, away from developed areas. Therefore, the 2008 ALP Alternative would result in greater impacts related to aircraft noise compared to the project, though impacts would be less than significant.

With regard to construction vibration, because the 2008 ALP Alternative does not include as many landside improvements that could potentially impact historic buildings, impacts would be reduced; however, in the case of the historic hangars on the west side it would be because these structures would be demolished. Impacts related to construction vibration would be reduced but would still require mitigation.

8.6.2.10 Public Services

Under the 2008 ALP Alternative, the amount of landside facilities would be reduced; however, a reduction in the number of hangar sites, tie-downs, and parking spaces, is not likely to substantially affect the demand for public services. The improvements associated with the terminal building would not occur, however, since those improvements would not increase the number of Airport employees, the level of public services needed would not be changed. Impacts under the 2008 ALP Alternative would be less than significant, similar to the proposed project.

8.6.2.11 Utilities

The 2008 ALP Alternative would not result in the airport improvements identified in the project. As such, under the 2008 ALP Alternative, the land uses and operations at MYF would remain generally unchanged, and no impact related to utilities would occur. While improvements associated with the proposed project would result in a minimal increase in utility usage compared to existing conditions, since the 2008 ALP Alternative would not incorporate improvements such as a potentially expanded terminal building, impacts under the 2008 ALP Alternative would be reduced compared to the proposed project, but would remain less than significant.

8.6.2.12 Transportation

While the 2008 ALP Alternative would result in some airside improvements, which would minimally increase construction-related vehicle trips, it would not result in the landside improvements identified in the project, such as expansion of the terminal building, construction of the public viewing area, hangars, tie-downs, and parking. As such, under the 2008 ALP Alternative, the land uses and operations at MYF would remain generally unchanged, and no impact related to ground-based transportation would occur. While improvements associated with the proposed project would result in a minimal increase in vehicle trips (151 trips) compared to existing conditions, these trips would not result in a significant impact. Therefore, the 2008 ALP Alternative would have a reduced impact compared to the project, but impacts would remain less than significant.

8.6.2.13 Visual Effects and Neighborhood Character

The 2008 ALP Alternative would not implement the landside improvements associated with the project, and rehabilitation of the terminal building would not occur. Therefore, although the

proposed project would have less than significant impacts in relation to visual effects and neighborhood character, the 2008 ALP Alternative would have a reduced impact.

8.6.3 Conclusion

Under the 2008 ALP Alternative, many environmental impacts would be reduced in comparison to the proposed project based because it would not implement as many airside or landside improvements as the proposed project. However, impacts associated with human remains, construction vibration, noise, hazardous materials, and biological resources would still be potentially significant and require mitigation. Mitigation associated with GHGs would no longer be required under the 2008 ALP Alternative because the terminal would not be expanded. Significant and unavoidable impacts to the VPHCP and MHPA would be avoided; however, because the historic hangars would be demolished, impacts associated with historic resources would likely be significant and unavoidable, greater than the proposed project, which would avoid those resources.

The 2008 ALP Alternative would not implement the many of the airside improvements associated with the project, including the removal of the Runway 28R displaced threshold, the planned hold bay at Taxiway A, other taxiway improvements, and installation of additional MALSR lighting. These features would provide greater safety, reduce the incidence of runway incursions, and are needed to accommodate the increasing demand for flights in the region. Without these and other airside improvements, the 2008 ALP Alternative would not fulfill **Objective 1: Implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria.**

Because the 2008 ALP Alternative would not install the proposed unleaded AvGas Tank, public viewing area, terminal expansion, hangars, tie-downs, and parking, the following objectives would also not be fulfilled: **Objective 2: Adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies;** **Objective 3: Accommodating regional demand for hangar, tie-down, and terminal space;** or **Objective 4: Maintaining a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities.**

By not implementing airside improvements that would affect sensitive biological resources, the 2008 ALP Alternative would fulfill **Objective 5: Preserving natural and historic resources within Airport lands.**

8.7 Reduced Project (No Removal of Displaced Threshold) Alternative

8.7.1 Description

Under the Reduced Project Alternative, the removal of the displaced threshold at Runway 28R would not occur, and the corresponding related improvements would not be constructed, including the hold bay at Taxiway A, the MALSR lighting, and the PAPI.

The other airside improvements would remain the same as the proposed project, including the removal of pavement at the end of Runway 5 and Taxiway F, the construction of a new hold bay located off Taxiway H, along with reconfigurations of several other taxiways.

The landside components would remain the same as the proposed project, including construction of up to 92 new hangars, 48 new tie-down areas, the 6,400 SF expansion to the existing terminal building, along with other improvements such as a public viewing area (outside the fence line), and an unleaded fuel tank.

Impacts related to geology and soils; GHGs; historical, archeological and tribal cultural resources; human health, public safety and hazardous materials; hydrology and water quality, public services; utilities; transportation; and visual effects and neighborhood would not be different from the proposed project.

The topics of air quality, biological resources, land use, and noise are discussed below.

8.7.2 Environmental Analysis

8.7.2.1 Air Quality

The Reduced Project Alternative would construct most of the airside and landside improvements associated with the project, except for those associated with the removal of the displaced threshold at Runway 28R. Therefore, the Reduced Project Alternative would generally have a similar, though slightly reduced amount of construction disturbance compared to the project. Criteria pollutant and precursor pollutant emissions generated during construction or non-flight operational activities under the Reduced Project Alternative would be less than significant and reduced compared to the proposed project. Aircraft flight emissions would be similar to the proposed project (less than significant).

8.7.2.2 Biological Resources

Because the Reduced Project Alternative still includes many of the proposed airside and landside improvements associated with the project, it would still involve disturbance to sensitive biological habitats, including the MHPA area that is north of the hotel and near the runup areas, which would still require mitigation. However, under the Reduced Project Alternative, no action would be taken within MHPA portions of the Airport site. The 0.54 acre of vernal pool within the MHPA that would be disturbed by the proposed project would not occur. Therefore, it would avoid the significant and unavoidable impact to the VPHCP and MHPA associated with the project. Overall, the Reduced Project Alternative would result in reduced impacts to biological resources compared to the project, although mitigation would still be required.

8.7.2.3 Land Use

Under the Reduced Project Alternative, the unavoidably significant impact associated with consistency with the MSCP SAP and VPHCP would be avoided, reducing impacts as compared to the proposed project. Other impacts, such as those related to community division and consistency with the ALUCP, would be similar to the proposed project (no significant impacts).

8.7.2.4 Noise

The Reduced Project Alternative would construct most of the airside and landside improvements associated with the project, except for those associated with the removal of the displaced threshold at Runway 28R. Noise generated during construction or non-flight-related operational activities related to the implementation of the proposed project would be correspondingly reduced. Therefore, although the proposed project would result in less than significant impacts associated with noise, the Reduced Project Alternative would have a reduced impact.

The Reduced Project Alternative would not avoid potential impacts related to construction vibration that may affect historic structures because improvements that may be in close proximity to historic resources would still occur.

Similar to the proposed project, the specific uses associated with the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road are yet to be determined; therefore, there is the potential that noise levels could exceed property line noise limits, and impacts would be considered potentially significant and mitigation would still be required.

Noise generated from flight-related operational activities would be similar compared to the project since the projected number of operations would be the same. However, the Reduced Project Alternative would not include the removal of the displaced threshold. As shown in Figure 5.9-2, implementation of the project would result in a reduction in the northwestern extent of the 65 CNEL contour compared to future conditions without removal of the Runway 28R displaced threshold, which would shift aircraft takeoff and landing activity to the east, away from developed areas. Therefore, the Reduced Project Alternative would result in greater impacts related to aircraft noise compared to the project, though impacts would be less than significant.

The Reduced Project Alternative includes the same landside improvements as the proposed project that could potentially impact historic buildings; therefore, impacts related to construction vibration would be similar as the proposed project and would still require mitigation.

8.7.3 Conclusion

As stated earlier, because the Reduced Project Alternative contains many of the same airside and landside improvements as the proposed project, many of the environmental impacts would be the same as the proposed project. Impacts associated with biological resources, human remains, construction vibration, GHGs, hazardous materials, noise, and would still be potentially significant and require mitigation. Significant and unavoidable impacts to the VPHCP and MHPA would be avoided.

The Reduced Project Alternative would still implement the proposed landside improvements and many of the airside improvements, would avoid impacts to wetlands, thus fulfilling three objectives of the project, including: **Objective 3:** Accommodating regional demand for hangar, tie-down, and terminal space, **Objective 4:** Maintaining a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities; and **Objective 5:** Preserving natural and historic resources within Airport lands.

Under the Reduced Project Alternative, the displaced threshold at Runway 28R would not be

removed, the hold bay at Taxiway A would not be constructed and would result in a taxiway smaller than needed to meet the FAA requirements for the expansion and not be wide enough to reduce the incidence of runway incursions. Further, the MALSR lighting would not be installed, which would not meet FAA requirements for safe landings. Therefore, the Reduced Project Alternative would only partially fulfill two important stated objectives for the project, including **Objective 1:** Implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria; and **Objective 2:** Adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies.

8.8 Wetlands Avoidance Alternative

8.8.1 Description

Under the Wetlands Avoidance Alternative, the removal of the displaced threshold at Runway 28R would still occur but some of the corresponding related improvements would not be constructed, including the hold bay at Taxiway A, the MALSR lighting, and the access roads to the MALSR, to avoid impacts to biologically sensitive wetlands (vernal pool).

The other airside improvements would remain the same as the proposed project, including the PAPI, the removal of pavement at the end of Runway 5 and Taxiway F, the construction of a new hold bay located off Taxiway H, along with reconfigurations of several other taxiways. The landside components would remain the same as the proposed project, including construction of up to 92 new hangars, 48 new tie-down areas, the 6,400-SF expansion to the existing terminal building, along with other improvements such as a public viewing area (outside the fence line), and an unleaded fuel tank.

Impacts related to geology and soils; GHGs; historical, archeological and tribal cultural resources; human health, hydrology and water quality, noise; public services; utilities; transportation; and visual effects and neighborhood would not be different from the proposed project. The topics of air quality; biological resources; human health, public safety and hazardous materials; and land use are discussed below.

8.8.2 Environmental Analysis

8.8.2.1 Air Quality

The Wetlands Avoidance Alternative would construct most of the airside and landside improvements associated with the project, except for the hold bay at Taxiway A and the MALSR lighting. Therefore, the Wetlands Avoidance Alternative would generally have a similar, though slightly reduced amount of construction disturbance compared to the project. Criteria pollutant and precursor pollutant emissions generated during construction or non-flight operational activities under the Wetlands Avoidance Alternative would be less than significant and reduced compared to the proposed project. Aircraft flight emissions would be similar to the proposed project (less than significant).

8.8.2.2 Biological Resources

Because the Wetlands Avoidance Alternative still includes many of the proposed airside and landside improvements associated with the project, it would still involve disturbance to sensitive biological habitats, including the MHPA area that is north of the hotel and near the runup areas, which would still require mitigation. However, under the Wetlands Avoidance Alternative, no action would be taken within MHPA portions of the Airport site. The 0.54 acre of vernal pool within the MHPA that would be disturbed by the proposed project would not occur. Therefore, it would avoid the significant and unavoidable impact to the VPHCP and MHPA associated with the project. Overall, the Wetlands Avoidance Alternative would result in reduced impacts to biological resources compared to the project, although mitigation would still be required.

8.8.2.3 Human Health, Public Safety, and Hazardous Materials

The Wetlands Avoidance Alternative still includes many of the proposed airside and landside improvements associated with the project. Under the Wetlands Avoidance Alternative, the removal of the displaced threshold at Runway 28R would still occur but some of the corresponding related improvements would not be constructed, including the hold bay at Taxiway A, and the MALSR lighting, and the access roads to the MALSR.

The Wetlands Avoidance Alternative would use hazardous materials and dispose of hazardous waste that are associated with the construction of improvements and operation of the Airport similar to the proposed project. Construction of improvements from the Wetlands Avoidance Alternative could result in similar hazardous materials site risks of exposure as the proposed project. Therefore, the Wetlands Avoidance Alternative would result in potentially significant impacts associated with human health, public safety, and hazardous materials that would be reduced to less than significant with mitigation incorporated, similar to the proposed project.

Risks associated with wildland fire and emergency response would be less than significant, similar to the proposed project.

Because the Wetland Avoidance Alternative would not construct the new hold bay at Taxiway A, it would result in a taxiway smaller than needed to meet the FAA requirements for the expansion and not be wide enough to reduce the incidence of runway incursions. In addition, the MALSR lighting and associated access roads would not be installed, which would not meet FAA requirements for safe landings. Therefore, implementation of the Wetlands Avoidance Alternative may result in a significant and unavoidable impact by creating a safety hazard for people residing or working in a designated airport influence area. This represents a substantially greater impact than the proposed project.

8.8.2.4 Land Use

Under the Wetlands Avoidance Alternative, the unavoidably significant impact associated with consistency with the MSCP SAP and VPHCP would be avoided, reducing impacts as compared to the proposed project. Other impacts, such as those related to community division and consistency with the ALUCP, would be similar to the proposed project (no significant impact).

8.8.3 Conclusion

As stated earlier, because the Wetlands Avoidance Alternative contains many of the same airside and landside improvements as the proposed project, many of the environmental impacts would be the same as the proposed project. Impacts associated with biological resources, human remains, construction vibration, GHGs, hazardous materials, noise, and would still be potentially significant and require mitigation. Significant and unavoidable impacts to the VPHCP and MHPA would be avoided. However, the Wetlands Avoidance Alternative would result in a significant and unavoidable impact related to aircraft safety hazard, which would not occur with the proposed project.

The Wetlands Avoidance Alternative would fulfill three objectives of the project, including:

Objective 3: Accommodating regional demand for hangar, tie-down, and terminal space;

Objective 4: Maintaining a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities; and **Objective 5:** Preserving natural and historic resources within Airport lands.

Under the Wetland Avoidance Alternative, the hold bay at Taxiway A would not be constructed and would result in a taxiway smaller than needed to meet the FAA requirements for the expansion and not be wide enough to reduce the incidence of runway incursions. Further, the MALSR lighting and associated access roads would not be installed, which would not meet FAA requirements for safe landings. Therefore, the Wetlands Avoidance Alternative would only partially fulfill two important stated objectives for the project, including **Objective 1:** Implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria; and **Objective 2:** Adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies.

8.9 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an Environmentally Superior Alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the Environmentally Superior Alternative, another Environmentally Superior Alternative must be identified.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the Environmentally Superior Alternative. This alternative would not result in potentially significant impacts associated with biological resources; historic, archaeological, and tribal cultural resources; hazards and hazardous materials; and construction vibration. The No Project Alternative would not meet the objectives of the project, except for Objective 5. Safety improvements associated with bringing the Airport into compliance with current FAA regulations would not occur, which may result in decreased operational safety associated with future aircraft operations.

Of the remaining alternatives, the Environmentally Superior Alternative is the Reduced Project Alternative, as it would avoid the unavoidably significant biological resource and land use impacts associated with consistency with the MSCP SAP and VPHCP. However, mitigation associated with sensitive species, sensitive habitats, wetlands, GHGs, historical resources, human remains,

hazardous materials, noise, and vibration would still be required. Other impacts that were considered less than significant for the project would be further lessened under the Reduced Project Alternative.

The Reduced Project Alternative would fulfill three objectives of the project, including accommodating regional demand for hangar, tie-down, and terminal space; maintaining a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities; and preserving natural and historic resources within Airport lands. The Reduced Project Alternative would only partially fulfill two important stated objectives for the project, including implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria; and adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies.

Table 8-1
SUMMARY OF ANALYSIS FOR ALTERNATIVES TO THE PROJECT

Issue Area	Proposed Project	No Project Alternative	Existing 2008 ALP Alternative	Reduced Project Alternative	Wetlands Avoidance Alternative
Air Quality					
Conflicts with Air Quality Plan	LTS	NI	LTS	LTS	LTS
Air Quality Standards	LTS	LTS-	LTS-	LTS-	LTS-
Sensitive Receptors	LTS	NI	LTS-	LTS-	LTS-
Odors	LTS	NI	LTS	LTS	LTS
Biological Resources					
Sensitive Species	LTSM	NI	LTSM-	LTSM-	LTSM-
Sensitive Habitats	LTSM	NI	LTSM-	LTSM-	LTSM-
Wetlands	LTSM	NI	LTSM-	LTSM-	LTSM-
Wildlife Movement	LTS	NI	LTS	LTS	LTS
Conservation Planning	SU	NI	LTS	LTS	LTS
Geology and Soils					
Seismic Hazards	LTS	NI	LTS-	LTS	LTS
Erosion and Sedimentation	LTS	NI	LTS-	LTS	LTS
Geologic Instability	LTS	NI	LTS-	LTS	LTS
Greenhouse Gas Emissions					
Greenhouse Gas Emissions	LTSM	NI	LTS	LTSM	LTSM
Conflict with Plans and Policies	LTSM	NI	LTS	LTSM	LTSM
Historical, Archaeological, and Tribal Cultural Resources					
Historical Resources	LTSM	LTSM	SU	LTSM	LTSM
Archaeological Resources	LTS	NI	LTS	LTS	LTS
Human Remains	LTSM	NI	LTSM	LTSM	LTSM
Tribal Cultural Resources	LTS	NI	LTS	LTS	LTS
Human Health, Public Safety, & Hazardous Materials					
Wildland Fire Risk	LTS	LTS	LTS	LTS	LTS
Hazardous Emissions and Materials	LTS	LTS	LTS	LTS	LTS
Emergency Response Plans	LTS	LTS	LTS	LTS	LTS
Hazardous Materials Sites	LTSM	LTS	LTSM	LTSM	LTSM

Issue Area	Proposed Project	No Project Alternative	Existing 2008 ALP Alternative	Reduced Project Alternative	Wetlands Avoidance Alternative
Areas of Potential Environmental Concern	LTSM	LTS	LTSM	LTSM	LTSM
Upset or Accidental Release	LTSM	LTS	LTSM	LTSM	LTSM
Aircraft Hazards	LTS	LTS	LTS	LTS	SU
Hydrology and Water Quality					
Flooding and Drainage Patterns	LTS	NI	LTS-	LTS	LTS
Flood Hazard Areas	LTS	NI	LTS-	LTS	LTS
Water Quality	LTS	NI	LTS-	LTS	LTS
Groundwater	LTS	NI	LTS-	LTS	LTS
Land Use					
Conflict with Applicable Land Use Plans	LTSM	NI	LTSM	LTSM	LTSM
Consistency with the MSCP SAP and VPHCP	SU	NI	LTS	LTS	LTS
Consistency with Adopted Airport Land Use Compatibility Plans	LTS	NI	LTS	LTS	LTS
Community Division	NI	NI	NI	NI	NI
Noise					
Ambient Noise	LTS	NI	LTS-	LTS	LTS
Noise-Land Use Compatibility	LTS	NI	LTS-	LTS	LTS
Aircraft Noise	LTS	LTS+	LTS+	LTS+	LTS
SDMC-On-site Generated Noise	LTSM	NI	LTSM	LTSM	LTSM
Construction Noise	LTSM	NI	LTSM-	LTSM-	LTSM
Vibration	LTSM	NI	LTSM-	LTSM	LTSM
Public Services and Facilities					
Police, Fire, Parks, Schools, Libraries	LTS	NI	LTS	LTS	LTS
Public Utilities					
Water Supply	LTS	NI	LTS-	LTS	LTS
Utilities	LTS	NI	LTS-	LTS	LTS
Solid Waste Management	LTS	NI	LTS-	LTS	LTS
Transportation					
Conflicts with Plans/Policies	LTS	NI	LTS-	LTS	LTS
Vehicle Miles Traveled	LTS	NI	LTS-	LTS	LTS
Traffic Hazards	LTS	NI	LTS-	LTS	LTS
Emergency Access	LTS	NI	LTS-	LTS	LTS
Visual Effects and Neighborhood Character					
Scenic Vistas or Views	LTS	NI	LTS-	LTS	LTS
Neighborhood Character	LTS	NI	LTS-	LTS	LTS
Landform Alteration	LTS	NI	LTS-	LTS	LTS
Light and Glare	LTS	NI	LTS-	LTS	LTS
Loss of Distinctive Landmark Trees	LTS	NI	LTS-	LTS	LTS

SU = Significant and Unavoidable Impact; LTSM = Less than Significant Impact with Mitigation; LTS = Less than Significant Impact; NI = No Impact; "-" = Reduced impact relative to the project; "+" = Increased impact relative to the project

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