



THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 625280
SCH No. 2020080438

SUBJECT: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II: A Site Development Permit (SDP) for impacts to Environmentally Sensitive Lands for a project to develop a new helicopter hanger space (new and existing area 32,000 Sq. Ft), new and existing apron area (65,000 Sq. Ft), two above ground fuel storage tanks, and parking at Montgomery-Gibbs Executive Airport in the Kearny Mesa Community Plan Area and City Council District 6. APPLICANT: City of San Diego, Real Estate Assets Department, Airports Division - Montgomery Field Airport.

Update 9/10/2021

Revisions have been made to the draft Mitigated Negative Declaration (MND). Added language would appear in ~~strikeout~~ and underline format. Clarifications to the Project Description and Biological Resources section of the Initial Study have been made. The updates made would not result in any changes to the environmental impacts associated with the project. As such, no recirculation of the MND is required. In accordance with the California Environmental Quality Act, Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated where there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact.

- I. PROJECT DESCRIPTION: See attached Initial Study.
- II. ENVIRONMENTAL SETTING: See attached Initial Study.
- III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas: **Biological Resources** and **Tribal Cultural Resources**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects

previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS – PART I

Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II

Post Plan Check (After permit issuance/Prior to start of construction)

1. PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT. The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

Qualified Biologist

Note:

Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**

2. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) #596507 and /or Environmental Document # 596507, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc

Note:

Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. OTHER AGENCY REQUIREMENTS: Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.

Federal Aviation Administration (FAA) - NEPA/ALP (Airport Layout Plan)

U.S Army Corps of Engineers - 404 Permit

Regional Water Quality Control Board - 401 Permit

4. MONITORING EXHIBITS

All consultants are required to submit , to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

5. OTHER SUBMITTALS AND INSPECTIONS:

The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST			
Issue Area	Document Submittal	Associated Inspection/Approvals	Notes
Pre-Con. Meeting	Request Letter	MMC Approval	3 Days prior to Pre-con. meeting
General	Consultant Qualification Letters	MMC Approval	3 Days prior to Pre-con. meeting
Issue Area	Document Submittal	Associated Inspection/Approvals	Notes
General	Biological Monitoring Exhibits	MMC Approval	3 Days prior to Pre-con. meeting
DOCUMENT SUBMITTAL/INSPECTION CHECKLIST CONTINUED			
Issue Area	Document Submittal	Associated Inspection/Approvals	Notes
Biology	Pre-Construction Survey Results	MMC Approval	3 Days prior to Pre-con. meeting
Biology	Limit of Work Verification Letter	MMC Approval/Inspection	Prior to beginning work
Vernal Pool Restoration	Installation Report	MMC Installation Inspection	ASAP After installation
Vernal Pool Restoration	120 day Completion Report	MMC 120-day Inspection	1 week after submittal
Vernal Pool Restoration	Annual Report – 1 year	MMC 1-year Inspection	1 week after submittal
Vernal Pool Restoration	Annual Report – 2 year	MMC 2-year Inspection	1 week after submittal
Vernal Pool Restoration	Annual Report –3 year	MMC 3-year Inspection	1 week after submittal
Vernal Pool Restoration	Annual Report – 4 year	MMC 4-year Inspection	1 week after submittal

Vernal Pool Restoration	Annual Report – 5 year	MMC 5-year Inspection	1 week after submittal
Final Approval	Request for Final Inspection	MMC Final Inspection	1 Week Prior to Final Inspection
Cultural Resources Monitoring Report(s)	Monitoring Report(s)	Archaeological/Historic Site (Archaeology) Observation	

B. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

BIOLOGICAL RESOURCES

Biological Resources Protection During Construction

BIO-1: Vernal Pool Habitat Mitigation

Prior to the issuance of notice to proceed, permittee shall provide documentation City's Multiple Species Conservation Program (MSCP) and Development Services Department Environmental designee outlining a timeline for implementation of the off-site vernal pool mitigation plan in accordance with *Vernal Pool Mitigation Plan for the La Media Road Widening & Fire Rescue Air Operations Phase II Project San Diego, California* prepared by RECON (December 12, 2019) located at the South Otay 1-acre parcels. Impacts to San Diego Mesa Hardpan vernal pool shall be mitigated in accordance with the City's Vernal Pool Habitat Conservation Plan (VPHCP) and Biology Guidelines 2018.

Table 7. Required Mitigation for Impacts to Vegetation Communities			
Vegetation Type	Direct Impacts (acres)	Mitigation Ratio	Required Mitigation
Developed (Tier IV)	1.747	0:1	0
Disturbed (Tier IV)	1.883	0:1	0
San Diego Mesa Hardpan Vernal Pool (Wetland)	0.089	2:1	0.178
Total	3.719	--	0.178

BIO-2: Biological Resources Protection During Construction

Biologist Verification - Prior to the pre-construction meeting and the start of any project work the owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) and Multiple Species Conservation Program (MSCP) sections stating that a Project Biologist (Qualified

Biologist), as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The biologist(s) shall be knowledgeable of vernal pool species biology and ecology, and burrowing owl biology and ecology. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project. The project biologist will perform the following duties:

I. Prior to Construction

A. Pre-Construction Meeting – The Qualified Biologist(s) 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.

B. 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, VPHCP, ESL Ordinance, project permit conditions, CEQA, endangered species acts (ESAs), and/or other local, state, or federal requirements.

C. Biological Construction Mitigation/Monitoring Exhibit – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in B above. In addition, it includes: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, vernal pool buffer, 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.

D. 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. The Qualified Biologist shall oversee the installation of erosion control measures within and upslope of vernal pools. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

E. 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 educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna. At a minimum, training shall include (1) the purpose for

resource protection; (2) a description of the vernal pool species and their habitat(s); (3) the conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, and vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing); (4) environmentally responsible construction practices as outlined in measures 5, 6 and 7; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and (6) the general provisions of the project's mitigation monitoring and reporting program (MMRP), the need to adhere to the provisions of Federal Endangered Species Act (FESA), and the penalties associated with violating FESA.

F. Avian Protection Requirements –To avoid any direct impacts to avian species identified as listed, candidate, sensitive, or special status in the MSCP (California Gnatcatcher and Western Burrowing Owl), removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City Development Services Department for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

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. The Qualified Biologist shall periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.

B. Monitoring (Vernal Pools) - The Qualified Biologist shall inspect the fencing and erosion control measures within and upslope of vernal pool preservation areas a minimum of once per

week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately.

C. 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.

D. Stop Work – Halt work, if necessary, and confer with the City to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to the City with 24 hours of its occurrence.

E. Reporting – Submit regular (e.g. weekly) letter reports to MMC and the City representative during project construction. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVSR). The CSVSR 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.

III. Post Construction Measures

A. Final Report - Submit a final report following completion of construction. The final report shall include asbuilt construction drawings with an overlay of habitat that was impacted and avoided, photographs of habitat areas that were avoided, and other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with all conservation measures was achieved. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and 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.

BIO-3: Species Specific Mitigation

(Required to meet MSCP Subarea Plan Conditions of Coverage) for Potential Impacts to Western Burrowing Owl and Associated Habitat located OUTSIDE the MHPA (BUOW and associated habitat impacts within the MHPA MUST BE AVOIDED)

PRECONSTRUCTION SURVEY ELEMENT

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 ADD of Entitlements and Multiple Species Conservation Program (MSCP) staff verifying that a

Biologist possessing qualifications pursuant "Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency Department of Fish and Game. March 7, 2012 (hereafter referred as CDFG 2012, Staff Report), has been retained to implement a burrowing owl construction impact avoidance program.

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.

Prior to Start of Construction:

1. The Applicant Department or Permit Holder and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the project site; regardless of the time of the year. "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.
2. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report - Appendix D
3. 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of preconstruction/take avoidance surveys. Verification shall be provided to the City's Mitigation Monitoring and Coordination (MMC) and MSCP Sections. If results of the preconstruction surveys have changed and BUOW are present in areas not previously identified, immediate notification to the City and WA's shall be provided prior to ground disturbing activities.

During Construction:

1. **Best Management Practices shall be employed as** 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 protocol 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. **On-going BUOW Detection** - If BUOWs or active burrows are not detected during the pre-construction 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 ALLOWS FOR ANY BUOWS TO BE INJURED OR

KILLED OUTSIDE **OR** WITHIN THE MHPA; 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 CDFW Staff Report 2012 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*).

- 1) If no active burrows are found but BUOWs are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.
- 2) If no active burrows are found but BUOWs are observed during follow up monitoring to repeatedly (4 or more sightings) use the site for roosting or foraging, the City's MMC and MSCP Sections shall be notified and any portion of the site where owls have been sites and that has not been graded or otherwise disturbed shall be avoided until further notice.
- 3) If a BUOW begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section B must be followed.
- 4) 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 Appendix D CDFG 2012, Staff Report 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*).

- 1) 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.**
- 2) 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 and MSCP Sections shall be contacted. The City's MSCP and MMC Section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist appropriate City biologist for on-going coordination with the Wildlife Agencies and the qualified consulting 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.

- a) **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. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.
- b) **During Breeding Season** - If a BUOW is using a burrow on-site during the breeding season (Feb 1-Aug 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 preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

3. Survey Reporting During Construction - Details of construction surveys and evictions (if applicable) carried out shall be immediately (within 5 working days or sooner) reported to the City's MMC, and MSCP Sections and the Wildlife Agencies and must be provided in writing (as by e-mail) and acknowledged to have been received by the required Agencies and DSD Staff member(s).

Post Construction:

- 1. Details of the all surveys and actions undertaken on-site with respect to BUOWs (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 off all previous reports for the site; and maps of the project site and BUOW locations on aerial photos.

BIO-4: Revegetation of Temporary Impacts

Following completion of all construction work, any areas where soils were temporarily disturbed and not developed, shall be revegetated for erosion control, in accordance with the City's Landscape Standards and biological guidelines. A native low-grow upland seed mix shall be applied via hydroseed to all areas temporarily impacted. The Project Biologist will be responsible for developing the seed palette and must submit to MMC and the City's Representative for approval. Revegetated

areas will be maintained and monitored for a minimum of 25-months to ensure successful erosion control.

BIO-5: Installation of Barrier

Following completion of all construction work, a barrier shall be installed along both sides of the access road from Ponderosa Ave to the control tower parking lot to prevent unauthorized access into the MHPA and adjacent sensitive habitat. The barrier shall also be installed along the north-eastern boundary of the project site. The barrier design shall prevent vehicle access into environmentally sensitive areas and may consist of poles 3 to 4 feet tall with a rope or chain ran between the poles. The design of the barrier must be approved by Airport staff prior to installation and the installation must be monitored by a qualified vernal pool biologist. Signage for environmentally sensitive areas shall be posted and maintained at conspicuous locations along the barrier.

TRIBAL CULTURAL RESOURCES

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check

1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. Prior to Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (quarter-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)

The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.

3. Identify Areas to be Monitored

- a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
- b. The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals and associated appurtenances and/or any known soil conditions (native or formation).
- c. MMC shall notify the PI that the AME has been approved.

4. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as age of existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

5. Approval of AME and Construction Schedule

After approval of the AME by MMC, the PI shall submit to MMC written authorization of the AME and Construction Schedule from the CM.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly

(Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from MMC, CM and RE. ADRP and any mitigation must be approved by MMC, RE and/or CM before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - (1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."

- c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

- (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resource; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.

- (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.

D. Discovery Process for Significant Resources - Pipeline Trenching and other Linear Projects in the Public Right-of-Way

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities or for other linear project types within the Public Right-of-Way including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance:

1. Procedures for documentation, curation and reporting

- a. One hundred percent of the artifacts within the trench alignment and width shall be documented in-situ, to include photographic records, plan view of the trench and profiles of side walls, recovered, photographed after cleaning and analyzed and curated. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact.
- b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.
- c. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) the resource(s) encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines. The DPR forms shall be submitted to the South Coastal Information Center for either a Primary Record or SDI Number and included in the Final Monitoring Report.
- d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are NOT Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment

of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.

a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.

- d. The PI shall immediately contact the RE and MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC via the RE for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.
3. The PI shall submit the Accession Agreement and catalogue record(s) to the RE or BI, as appropriate for donor signature with a copy submitted to MMC.
4. The RE or BI, as appropriate shall obtain signature on the Accession Agreement and shall return to PI with copy submitted to MMC.
5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC of the approved report.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

Federal Government

Federal Aviation Administration

U.S. Army Corps of Engineers

U.S. Fish & Wildlife Service

U.S. Environmental Protection Agency

MCAS Miramar Air Station

State of California

State Clearinghouse
California Department of Fish & Wildlife
Regional Water Quality Control Board, Region 9
Native American Heritage Commission

City of San Diego

Councilmember Chris Cate - District 6
Mayor's Office
City Attorney's Office
Development Services
 Sara Osborn, EAS
 Liz Shearer-Nguyen, EAS
 Karen Howard, Project Management
 Khanh Huynh, Engineering
 Philip Lizzi, Planning
 Sam Johnson, MMC
Planning Department
 Victoria White, Plan-Airport
 Kristen Forburger, MSCP
 Alyssa Muto
 Tom Tomlinson, Facilities Financing
Public Works
 James Botica
 Natalie de Freitas
 Peter Fogec
 Sean Paver
Airport, Jorge Rubio
Water Review, Leonard Wilson

Other Organizations and Interested Parties

Kearny Mesa Community Planning Group
Serra Mesa Planning Group
Linda Vista Planning Group
Sierra Club
San Diego Audubon Society
Mr. Jim Peugh
California Native Plant Society
Endangered Habitats League
Wetland Advisory Board
John Stump
Richard Drury
Komalpreet Toor
Stacey Osborne
Historical Resources Board
Carmen Lucas
South Coastal Information Center

San Diego Archaeological Center
Save Our Heritage Organisation
Ron Christman
Clint Linton
Frank Brown – Inter-Tribal Cultural Resources Council
Campo Band of Mission Indians
San Diego County Archaeological Society, Inc.
Kumeyaay Cultural Heritage Preservation
Kumeyaay Cultural Repatriation Committee
Native American Distribution
Mary Johnson
Serra Mesa Community Council
San Diego Mesa College
University of San Diego
Friars Village HOA
Joy Hagin c/o Cubic Corp
Bob Basso c/o Basso Family Ventures, LLC
Rincon Band of Luiseño Indians
Sandra Stahl - Montgomery-Gibbs Environmental Coalition
Lesley Handa - Handa Ornithology Lab
John Riedel

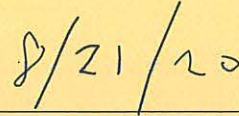
VII. RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.



Sara Osborn
Senior Planner
Development Services Department



Date of Draft Report

11/8/2021

Date of Final Report

Analyst: Sara Osborn

Attachments:

- Appendix A: Fire Rescue Air Operations Phase II (i.e. aerial location map)
- Appendix B: Fire Rescue Air Operations – Phase II (PTS 625280) Overall Site Plan
- Appendix C: Fire Rescue Air Operations – Phase II (PTS 625280) Air Operations Site Plan
- Appendix D: Preliminary Grading Plan for Air Operation Hangars
- Appendix E: San Diego Fire-Rescue Air Operations – Phase II Site Development Permit Submittal Set
- Appendix F: Montgomery Gibbs Executive Airport – Fire-Rescue Air Operations Facility Project – Phase II, San Diego, California – Biological Resources Report
- Appendix G: Vernal Pool Mitigation Plan for the La Media Road Widening & Fire-Rescue Air Operations Phase II Project San Diego, California
- Appendix H: Historical Resources Survey for the San Diego Fire-Rescue Air Operations Hangar Project
- Appendix I: Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) San Diego Fire Rescue Air Facility
- Appendix J: Drainage Report for Montgomery Air Fire Rescue Facility
- Appendix K: Preliminary Geotechnical Evaluation – San Diego Fire-Rescue Air Operations Hangars Montgomery-Gibbs Executive Airport San Diego, California
- Appendix L: Federal Aviation Administration (Approval of Heights)
- Appendix M: Jurisdictional Waters-Wetland Delineation for the San Diego Fire-Rescue Air Operations Hangar Project San Diego, California

Response to Comments

List of Commenters

During the public review period, a total of 8 comment letters were received on the Draft MND. The comment letters have been categorized by sender (e.g., agency, organization, individual) and assigned a unique letter-number designation based on category. The list of commenters and the unique letter-number designators for each letter are shown below in Table 1. Comment Letters, List of Commenters. Individual comments within each letter are bracketed and subsequently numbered in the right-hand margin of the comment letter. Bracketed/ numbered comment letters are placed before the responses to the letter.

Table 1. Comment Letters, List of Commenters

Letter	Author	Date
STATE		
A	David Mayer California Department of Fish and Wildlife	September 28, 2020
AA	State Clearinghouse	September 28, 2020
ORGANIZATIONS, GROUPS, AND INDIVIDUALS		
B	James Royle San Diego County Archaeological Society	August 28, 2020
C	Deneen Pelton Rincon Band of Luiseño Indians	September 4, 2020
D	John Peugh San Diego Audubon Society	September 28, 2020
E	Sandra Stahl Montgomery-Gibbs Environmental Coalition	September 25, 2020
F	Lesley Handa Handa Ornithology Lab	September 28, 2020
G	John Riedel	September 28, 2020

Comments



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Rd
San Diego, CA 92107
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 28, 2020

Sara Osborn
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@sandiego.gov

Dear Ms. Sara Osborn:

City of San Diego: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations
Facility Project – Phase II Project No. 625280 (PROJECT) **MITIGATED NEGATIVE
DECLARATION (MND) / SCH# 2020080438**

A - 1

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of San Diego (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

A - 2

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).)

CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

A - 3

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Responses

A. David Mayer - California Department of Fish and Wildlife

A-1. Comment noted. The comment does not address the adequacy of the draft Mitigated Negative Declaration. No further response is required.

A-2. Comment noted. The City acknowledges CDFW as a Trustee Agency. No further response is required.

Comments

Sara Osborn
Environmental Planner
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September 28, 2020
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cont.
A - 3

Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

A - 4

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP program by implementing its approved City Multiple Species Conservation Program (MSCP) through implementation of the City of San Diego MSCP Subarea Plan (SAP). The Multi Habitat Preserve Area (MHPA) is the reserve area required to adequately conserve covered species covered by the SAP, and is a hardline preserve.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego, Real Estate Assets Department, Airports Division - Montgomery Field Airport

Objective: The Project will provide hangar space and a concrete apron to accommodate five helicopters, parking, and shelter for a single helicopter tender and two fueling tender vehicles. The area of new hangar space will be approximately 32,000 square feet (SF), of which approximately 16,500 SF is existing disturbed and/or impervious area. The new hangar space includes a hangar support area for maintenance offices, overhaul, avionics, and storage rooms. The new apron area will be concrete, of which approximately 9,300 SF is existing disturbed and/or impervious area. The project includes two above-ground fuel storage tanks, each with 12,000-gallon capacity (24,000 gallons total). This facility will support and accommodate 24-hour staffing for nine staff. The staging area for the project will be placed on existing paved and/or disturbed area, and is designed to be approximately 4,000 SF.

Construction access to the site will be via the airport perimeter gate at 4302 Ponderosa Avenue, and an unnamed access road which leads directly to the site. The Project will address any damages to the access road sustained from construction activities. The rehabilitation of the existing access road will include a two-inch overlay of asphalt material in any areas deemed necessary and will not impact any undisturbed areas.

The Project will require a Site Development Permit (SDP) for impacts to Environmentally Sensitive Lands (ESL) in the form of biological resources.

Location: The project site is located on Montgomery-Gibbs Executive Airport, east of SR-163, west of Ruffin Road, south of Balboa Avenue, and north of Aero Drive. Fire-Rescue Air Operations Phase 2 hangar will be located north of the F.A.A. air traffic control tower, and east of Taxiway 'C'.

A - 6

Biological Setting: The Project is located adjacent to the MHPA; access to the site crosses through the MHPA via the existing access road. Five vegetation communities were

Responses

A-3. Comment noted. The City acknowledges CDFW as a Responsible Agency. No further response is required.

A-4. Comment noted. This comment summarizes the NCCP and MSCP programs. No response is necessary.

A-5. Comment noted. This comment summarizes the project. No response is necessary.

A-6. Comment noted. This comment summarizes the adjacent habitat and impacts. No response is necessary.

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Comments

- cont. mapped within the survey area and include Diegan coastal sage scrub, non-native
A - 6 grasslands, disturbed land, San Diego mesa hardpan vernal pool, and developed land.
The Project would result in direct impacts to one sensitive vegetation community: San
Diego mesa hardpan vernal pool habitat (0.089 acre). These impacts would be mitigated at
a 2:1 ratio, for a required mitigation amount of 0.178 acre, in accordance with the Vernal
Pool Mitigation Plan for La Media Road Widening & Fire Rescue Air Operations Phase II
(RECON 2020), and pursuant to the City's VPHCP and Biology Guidelines. The re-
establishment and restoration of vernal pools, at the location known as the South Otay 1-
acre parcels, will occur to satisfy the required mitigation requirements.
- A - 7 Sensitive species that will be directly impacted by the Project include San Diego fairy
shrimp (*Branchinecta sandiegonensis*), Orcutt's brodiaea (*Brodiaea orcuttii*), and ashy
spike moss (*Selaginella cinerascens*). Sensitive species identified adjacent to the Project
and may be indirectly impacted by the Project include San Diego mesa mint (*Pogogyne
abramsii*), coastal California gnatcatcher (*Poliopitila californica californica*), and burrowing
owl (*Athene cunicularia*), all of which are covered species under the City's MSCP SAP.
- A - 8 **Timeframe:** A timeframe was not provided for the Project.
- COMMENTS AND RECOMMENDATIONS
- A - 9 CDFW offers the comments and recommendations below to assist the City in adequately
identifying and/or mitigating the Project's significant, or potentially significant, direct and
indirect impacts on fish and wildlife (biological) resources. Editorial comments or other
suggestions may also be included to improve the document. CDFW recommends the
measures or revisions below be included in a science-based monitoring program that
contains adaptive management strategies as part of the Project's CEQA mitigation,
monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA
Guidelines, § 15097).
- I. Project Description and Related Impact Shortcomings
- Impacts to the Access Road Within the MHPA
- COMMENT #1:
- A - 10 **Section: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations
Facility Project – Phase II Biological Resources Report (BRR) 2.2 Project
Description, Page:2**
- Issue:** Additional aspects of the Project are identified in the Biological Resources
Report (BRR) that are not discussed or identified in the MND or Initial Study (IS). The
MND does not address these impacts, which may have additional effects on sensitive
species located adjacent to the Project.
- A - 11 **Specific impact:** The BRR for the Project states,

Responses

- A-7. Comment noted. This comment summarizes species adjacent to, and within the
project footprint.
- A-8. Comment noted. The comment does not address the adequacy of the Draft MND. No
further response is required; however, a response is provided. Capital Improvement
Program (CIP) project schedules can be found on the City's CIP website for latest
information.
- A-9. Comment noted.
- A-10. Comment noted. This is stating the issue.
- A-11. The MND identifies improvements in the road related to paving and repairs. The
Biological Technical Report addresses and analyzes impacts associated with repair of the
road and installation of utilities. All utilities will be installed within the existing paved road.
This is clarified in the MND's Project Description.

Comments

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Environmental Planner
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- cont.
A - 11
- "[a]dditionally, the proposed project will design and relocate existing utility connections (Sewer, Stormwater, Gas, Water, Power, etc.) within the main access roadway from Ponderosa Avenue and project site."
- The MND does not specifically address this aspect in the Project description and states,
- A - 12
- "[c]onstruction access to the site will be via the airport perimeter gate at 4302 Ponderosa Avenue, and an unnamed access road which leads directly to the site. The project will address any damages to the access road sustained from construction activities. The rehabilitation of the existing access road will include a two-inch overlay of asphalt material in any areas deemed necessary and will not impact any undisturbed areas."
- A - 13
- Why impact would occur:** The BRR notes additional impacts to the access road in the MHPA beyond what is disclosed in the MND. Although the Project Description notes that the repair work would not impact any undisturbed areas, it does not explicitly address the utility connection work within the access road. This work may involve trenching and stockpiling of material. This utility work in the road should be adequately described in the MND for the Project.
- A - 14
- Evidence impact would be significant:** Without full disclosure of Project features and related impacts in the MND, CDFW cannot ascertain if all impacts have been mitigated below a level of significance.
- A - 15
- Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)**
- Mitigation Measure #1:**
- To reduce impacts to less than significant:** All aspects of the Project should be included in the description in the IS, specifically, any utility work done within the access road inside of the MHPA. Also, please include specific mitigation measures to ensure impacts are avoided to adjacent vernal pools, which contain species listed under either or both CESA and the federal Endangered Species Act (ESA) (please see comments # 2 and #4).
- II. Environmental Setting and Related Impact Shortcoming
- A - 16
- San Diego Mesa Mint Immediately Adjacent to Project Impacts and BRR Measure BIO-3 Was Not Included in MND**
- COMMENT #2:**
Section: BRR 6.1.2.1.3, Page:17

Responses

A-12. Comment noted. The comment quotes the project description of the draft MND.

A-13. As described in the Biological Technical Report and MND Project Description, all stockpiling, laydown, and storage would occur in existing developed areas. The project is required to comply with the VPHCP General Avoidance and Minimization measures to ensure indirect impacts to adjacent biological resources would be avoided.

A-14. No significant impact to biological resources would occur from utility work. Implementation of VPHCP and MHPA Land Use Adjacency Guidelines would be made conditions of the Site Development Permit approval, and therefore, indirect impacts would not result and thus impacts are determined to be less than significant.

A-15. All work included within the roadway is clarified in the MND and provided in the Project Description. Implementation of VPHCP General Avoidance and Minimization measures stated in section 7.2 of the Biological Technical Report would ensure impacts to adjacent vernal pools are avoided. These Avoidance and Minimization measures will be included as a condition of the Site Development Permit.

A-16. BIO-3 listed in the Biological Technical Report is an Avoidance and Minimization measures and will be included as a condition of the Site Development Permit.

Sara Osborn
Environmental Planner
City of San Diego
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Comments

- A - 17 **Issue:** San Diego Mesa Mint has been identified immediately adjacent to the access road. Measure BIO-2 is identified to mitigate potential indirect impacts to the species but does not provide adequate avoidance. Measure BIO-3: Vernal Pool Minimization and Avoidance Measure in the BRR, contains more specific measures but was not included in the MND.
- A - 18 **Specific impacts:** San Diego Mesa Mint occupied pools are located immediately adjacent to the access road that will be used for construction. There also may be additional utility work conducted within the access roadway. This is not addressed in sufficient detail in the MND.
- A - 19 The BRR states,
“[t]his is a Federally- and State-endangered, California Rare Plant Rank 1B.1 (California Native Plant Society, 2001), MSCP-covered, VPHCP covered, and narrow endemic species. This species was observed within the 100-foot survey limit in San Diego Mesa Hardpan Vernal Pools. A map showing the distribution and quantities of this species within the survey area can be found in Figure 5. The MSCP conditions of coverage for this species require the Preserve management plan must include measures to: 1) protect against detrimental effects; 2) maintain surrounding habitat for pollinators; and 3) maintain pool watershed areas. This species will not be directly impacted by this project, but due to its proximity to the project footprint there is a potential for this species to be indirectly impacted. To ensure direct and indirect impacts to this species are avoided and to ensure compliance with the conditions of coverage and VPHCP, Measure BIO-2 will be implemented.”
- A - 20 Although the BRR provides a map showing the relation of occupied pools, it should also note that pools containing this species were found immediately adjacent to the road, in some cases with no discernable buffer to the roadway. Furthermore, as noted in comment #1, there is additional utility work on the access road other than repair from construction. Both the MND and BRR call for Measure BIO-2 to mitigate indirect impacts to vernal pools using provision 1D and 2B.
- A - 21 “1 (D) Biologist shall oversee the installation of erosion control measures within and upslope of vernal pools. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction.
2 (B) The Qualified Biologist shall inspect the fencing and erosion control measures within and upslope of vernal pool preservation areas a minimum of once per week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately.”
- A - 22 **Why impact would occur:** These measures lack the specificity required to adequately avoid adjacent vernal pools. The BRR also identified Mitigation BIO-3 Vernal Pool

Responses

- A-17. Significant impacts to San Diego Mesa Mint will be avoided through compliance with the VPHCP and MHPA Land Use Adjacency Guidelines. BIO-3 outlined in the Biological Technical Report are Avoidance and Minimization measures and will be included as a condition of the Site Development Permit. All Avoidance and Minimization measures identified in the Biological Technical Report will be required and implemented during the project.
- A-18. Significant impacts to San Diego Mesa Mint will be avoided through compliance with the VPHCP and MHPA Land Use Adjacency Guidelines. The Avoidance and Mitigation measures included in the Biological Technical Report will become conditions of the Site Development Permit.
- A-19. Comment noted. This is restating Biological Technical Report.
- A-20. Comment noted. This comment is restating measures from the Biological Technical Report. Implementation of mitigation measures are outlined in the MND and the Avoidance and Minimization measures described in the Biological Technical Report will be included as conditions of Site Development Permit approval and would avoid impacts along the roadway.
- A-21. Comment noted. This comment is restating measures from Biological Technical Report.
- A-22. BIO-3 in the Biological Technical Report are Avoidance and Minimization measures and will be included as a condition of the Site Development Permit. All measures identified in the Biological Technical Report will be required and implemented during the project as MND mitigation measures or Site Development Permit conditions of approval.

Comments

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cont.
A - 22 | Minimization and Avoidance Measures, which was not included in the MND (please see comment #5 for more information). Measure BIO-3 would ensure more complete avoidance of vernal pools; Measure BIO-2 only includes two limited aspects BIO-3.

A - 23 | **Evidence impact would be significant:** Without implementation of the full range of protection measures identified in the BRR there may be additional impacts to listed and covered species that have not been mitigated below a level of significance.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #2:

Please incorporate Measure BIO-3 of the BRR into the MND.

To reduce impacts to less than significant:

BIO-3: Vernal Pool Minimization and Avoidance Measures

The following Measures are required to prevent potential impacts to Vernal Pools from construction activities and are pursuant to Section 5.2.1 of the VPHCP:

1. Any development adjacent to the MHPA shall be constructed to slope away from the extant pools to be avoided, to ensure that runoff from the project does not flow into the pools.

A - 24 | 2. Covered projects shall require temporary fencing (with silt barriers) of the limits of project impacts (including construction staging areas and access routes) to prevent additional vernal pool impacts and prevent the spread of silt from the construction zone into adjacent vernal pools. Fencing shall be installed in a manner that does not impact habitats to be avoided. Final construction plans shall include photographs that show the fenced limits of impact and all areas of vernal pools to be impacted or avoided. If work inadvertently occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing shall be removed upon project completion.

3. Impacts from fugitive dust that may occur during construction grading shall be avoided and minimized through watering and other appropriate measures.

4. A qualified monitoring biologist that has been approved by the City shall be on-site during project construction activities to ensure compliance with all construction measures identified in the CEQA environmental document. The biologist shall be knowledgeable of vernal pool species biology and ecology. The biologist shall perform the following duties:

- a. Oversee installation of and inspect the fencing and erosion control measures within or upslope of vernal pool restoration and/or preservation areas a minimum of once per week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately.

Responses

A-23. All Avoidance and Minimization measures identified in the Biological Technical Report are conditions of the site development permit and will be required and implemented during the project. Implementation of these measures will ensure impacts are avoided.

A-24. BIO-3 in the Biological Technical Report are Avoidance and Minimization measures and will be included as a condition of the Site Development Permit.

Comments

cont.
A - 24

- b. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.
 - c. Train all contractors and construction personnel on the biological resources associated with this project and ensure that training is implemented by construction personnel. At a minimum, training shall include (1) the purpose for resource protection; (2) a description of the vernal pool species and their habitat(s); (3) the conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, and vehicles, equipment, and construction materials, to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing); (4) environmentally responsible construction practices as outlined in measures 5, 6, and 7; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and (6) the general provisions of the project's mitigation monitoring and reporting program (MMRP), the need to adhere to the provisions of FESA, and the penalties associated with violating FESA.
 - d. Halt work, if necessary, and confer with the City to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to the City within 24 hours of its occurrence.
 - e. Submit regular (e.g., weekly) letter reports to the City during project construction and a final report to the City following completion of construction. The final report shall include as-built construction drawings with an overlay of habitat that was impacted and avoided, photographs of habitat areas that were avoided, and other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with all conservation measures was achieved.
5. The following conditions shall be implemented during project construction:
- a. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint.
 - b. The project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the site.
 - c. Disposal or temporary placement of excess fill, brush, or other debris shall be limited to areas within the fenced project footprint.
6. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering the vernal pools or their watersheds and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from the vernal pools or their watersheds. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. A spill kit for each piece of construction equipment shall be on-site and must be used in the event of a spill. "No-fueling zones" shall be designated on construction plans"

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Consistency Analysis with MHPA Adjacency Guidelines

COMMENT #3:

A - 25

Section: BRR 6.3.2, Page:19

Issue: The Project's analysis of toxins in the BRR does not include a full discussion of potential toxins that could be released during construction and during operation and maintenance of the Project.

A - 26

Specific impacts: The BRR states,

"[I]and uses such as recreation and agriculture that use chemicals or generate byproducts that are potentially toxic or harmful to wildlife, habitat, or water quality must incorporate measures to reduce the impact of application or drainage of such materials into the MHPA.

The proposed project would not involve recreation or agriculture, and the project would not use chemicals or generate toxic or harmful byproducts. The proposed project would incorporate permanent storm water Best Management Practices (BMPs) to prevent the drainage of toxins or harmful materials into the MHPA. There would not be a change to the baseline conditions and the project would not result in a significant impact due to toxins."

A - 27

Recreation and agriculture are only two examples of land uses that may use chemicals, and this does not imply other land uses would not have similar issues or more significant issues. It is unclear how there would be no use of chemicals, since on-site fuel storage is proposed for the Project, and there may be fueling of equipment during construction.

A - 28

Why impact would occur: Although permanent BMPs would be in place for storm water, spills, and other leaks during construction on the access road could have additional impacts if not addressed.

A - 29

Evidence impact would be significant: Appendix G of the CEQA Guidelines notes that an impact would be significant if it will have substantial adverse effect on sensitive species or habitats. As proposed, the Project may have impacts to both species and habitat, if fueling and spill prevention are not addressed in the mitigation measures in the MND. Measures, as those described in Measure BIO-3 (6), would help mitigate these impacts.

A - 30

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #2:

Responses

A-25. See response to comment A-27.

A-26. Comment noted. The comment is restating text from the Biological Technical Report.

A-27. While the Biological Technical Report does not examine every possible chemical that may be used at the site, as stated in the Biological Technical Report and Comment A-26 "The proposed project would incorporate permanent storm water Best Management Practices (BMP's) to prevent the drainage of toxins or harmful material into the MHPA." BMPs have been incorporated into the design of the project to capture and retain all drainage on-site and prevent the release of any material off site into adjacent areas. Implementation of the MND mitigation measures BIO-2, BIO-3 would ensure chemicals, toxins, or other materials are not released during construction.

A-28. See response to comment A-27.

A-29. BIO-3 in the Biological Technical Report are Avoidance and Minimization measures and will be included as a condition of the Site Development Permit. All measures identified in the Biological Technical Report will be required and implemented during the project as MND mitigation measures or Site Development Permit conditions of approval.

A-30. BIO-3 in the Biological Technical Report are Avoidance and Minimization measures and will be included as a condition of the Site Development Permit. All measures identified in the Biological Technical Report will be required and implemented during the project as MND mitigation measures or Site Development Permit conditions of approval.

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Comments

cont.
A - 30

To reduce impacts to less than significant: Please include incorporate Measure BIO-3 of the BRR into the MND.

III. Mitigation Measures and Related Impact Short Coming

COMMENT #4:

MND is Lacking BIO-4: California Gnatcatcher (CAGN) Measure Identified as Required to Mitigate Biological Impacts in the BRR

A - 31

Section:7.2 Page:33

Issue: The BRR identifies Measure BIO-4 to protect coastal California gnatcatchers, but this measure is not included in the MND. Suitable habitat is located along the access road and gnatcatchers have been identified foraging in the area. Individuals and nests could be indirectly impacted by utility work in the access road.

A - 32

Specific impacts: The MND states,

"[i]ndirect impacts to California gnatcatcher, western burrowing owl, and San Diego fairy shrimp would be avoided and minimized through implementation of the MHPA land use adjacency guidelines and Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures; these measures would reduce the level of impact to less than significant."

A - 33

As proposed, the MND does not contain adequate avoidance and minimization measures to mitigate the impacts to CAGN. Suitable habitat is located adjacent to the access road used for the Project, and CAGN individuals have been identified foraging in the Project vicinity. Without a sufficient avoidance measure they may be impacted by construction noise. The BRR identifies Measure BIO-4 to avoid impacts, but this was not included in the MND.

A - 34

Why impact would occur: Measure BIO 4 was identified by the BRR as required to avoid impacts to the gnatcatcher. Without discussion and inclusion of this measure, the Project could have indirect impacts to gnatcatchers that are not fully mitigated below a level of significance.

A - 35

Evidence impact would be significant: As noted above in Appendix G of the CEQA guidelines, impacts to sensitive species would be significant without mitigation. Without full disclosure in the MND and implementation of this measure prior to construction, the Project could have significant impacts.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Responses

A-31. All measures identified in the Biological Technical Report will be required as part of the implementation of the project. Implementation of these measures will ensure all impacts are avoided or mitigated below a level of significance. Measure BIO-4 in the Biological Technical Report will be included as a condition of the Site Development Permit approval.

A-32. Comment noted. Comment is restating text from the Biological Technical Report.

A-33. See response to comment A-31.

A-34. See response to comment A-31.

A-35. See response to comment A-31.

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A - 36

Mitigation Measure #3:

Please incorporate Measure BIO 4 from the BRR into the MND.

To reduce impacts to less than significant:

BIO-4: California Gnatcatcher (CAGN) Measure

Prior to the issuance of any grading permit, Notice to Proceed (NTP), or Pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur between March 1 and 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. 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 [dB(A)] hourly average 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 U.S. Fish and Wildlife Service 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 dB (A) hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB (A) hourly average 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 representative 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 dB(A) hourly average 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,

A - 37

Responses

A-36. See response to comment A-31.

A-37. Comment noted. Comment is restating text from the Biological Technical Report.

Comments

cont.
A - 37

noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB (A) 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 Montgomery Field Airport: 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 representative, 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.

B. 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 which demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:

- i. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A. shall be adhered to as specified above.
- ii. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

COMMENT #5

City Conditions of Project Approval is Deferred Mitigation Under CEQA

A - 38

Section: MND IV Biological Resources, Page: 32

Issue: The City maintains that measures would be required as permit conditions. Without suitable avoidance measures identified during the public review process in the MND, CDFW cannot ascertain if the measures will be adequately implemented for the protection of sensitive resources within and adjacent to the project.

Specific impact: The MND states,

A - 39

"[t]he municipal code requires this project to obtain a site development permit. California Gnatcatcher (CAGN) preconstruction surveys are required as conditions of project approval, therefore no impacts to CAGN would result with project implementation. The Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures will be conditions of project approval in the

Responses

A-38. Mitigation measures and avoidance measures are discussed in the Biological Technical Report, which was available for review during the MND's public comment period. All Avoidance and Minimizations measures identified in the Biological Technical Report are conditions of the Site Development Permit (SDP) and will be required and implemented during the project. Implementation of these measures will ensure all impacts are avoided or mitigated below a level of significance. This practice does not defer these avoidance measures because no construction can occur until the SDP, and its conditions, are approved.

A-39. Comment noted. Comment is restating text from MND.

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cont.
A - 39

project's site development permit."

A - 40

Why impact would occur: The avoidance and minimization measures mentioned in the comments above were not described in the text of the MND for this Project, and were located in a technical appendix, and conditions of permit approval do not have full public review and may not be sufficient to protect sensitive resources.

The City maintains that protection measures would be required as part of the permit process. When mitigation is deferred, CDFW cannot ascertain if the measures will be adequately implemented for the protection of sensitive resources within and adjacent to the project.

A - 41

Evidence impact would be significant: Section 15126.4 of the CEQA Guidelines states,

"[w]here several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time."

A - 42

Recommended Potentially Feasible Mitigation Measure(s)

The MND should fully consider possible impacts to adjacent sensitive species and habitats and provide avoidance and minimization measures in the MND.

A - 43

Mitigation Measure #4

To reduce impacts to less than significant: As discussed above, CDFW recommends that the CAGN measure and Vernal Pool Avoidance measure be included as avoidance and minimization measures for the Project and described in the text of the MND.

A - 44

Editorial Comments and Suggestions

CDFW also recommends that Project construction occur during the dry late summer and early autumn months, if practicable, to increase avoidance of vernal pool organisms.

A - 45

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:
http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The

Responses

A-40. See response to comment A-38.

A-41. See response to comment A-38.

A-42. See response to comment A-38.

A-43. See response to comment A-38.

A-44. Comment noted.

A-45. Comment noted. The comment does not address the adequacy of the Draft MND. No further response is required.

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cont.
A - 45 completed form can be mailed electronically to CNDDDB at the following email address:
CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

A - 46 The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

A - 47 CDFW appreciates the opportunity to comment on the MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Elyse Levy, Senior Environmental Scientist at Elyse.Levy@wildlife.ca.gov

Sincerely,



David A. Mayer
Environmental Program Manager
South Coast Region

Attachments:

Attachment A: Recommended Mitigation Measures

cc: Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

1. California Office of Planning and Research. 2019 or current version. CEQA: California Environmental Quality Act. Statutes and Guidelines, CEQA Guidelines §15126.4 and Appendix G
2. City of San Diego. 1997. Multiple Species Habitat Conservation Program MSCP Plan Subarea Plan
3. City of San Diego. 2012. Land Development Code - Biology Guidelines.

Responses

A-46. Comment noted. The comment does not address the adequacy of the Draft MND. No further response is required.

A-47. Comment noted. The comment does not address the adequacy of the Draft MND. No further response is required.

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Attachment A: Recommendations and Mitigation Measures

A - 48

Mitigation Measure #1: Include all aspects of the Project in the description in IS, specifically any utility work done to the access road inside of the MHPA. Also, please include specific mitigation measures to ensure impacts are avoided to adjacent vernal pools, which contain CESA and FESA listed species (please see measures # 2 and #3).

A - 49

Mitigation Measure #2 **BIO-3: Vernal Pool Minimization and Avoidance Measures**
The following Measures are required to prevent potential impacts to Vernal Pools from construction activities and are pursuant to Section 5.2.1 of the VPHCP:
1. Any development adjacent to the MHPA shall be constructed to slope away from the extant pools to be avoided, to ensure that runoff from the project does not flow into the pools.
2. Covered projects shall require temporary fencing (with silt barriers) of the limits of project impacts (including construction staging areas and access routes) to prevent additional vernal pool impacts and prevent the spread of silt from the construction zone into adjacent vernal pools. Fencing shall be installed in a manner that does not impact habitats to be avoided. Final construction plans shall include photographs that show the fenced limits of impact and all areas of vernal pools to be impacted or avoided. If work inadvertently occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing shall be removed upon project completion.
3. Impacts from fugitive dust that may occur during construction grading shall be avoided and minimized through watering and other appropriate measures.
4. A qualified monitoring biologist that has been approved by the City shall be on-site during project construction activities to ensure compliance with all construction measures identified in the CEQA environmental document. The biologist shall be knowledgeable of vernal pool species biology and ecology. The biologist shall perform the following duties:
a. Oversee installation of and inspect the fencing and erosion control measures within or upslope of vernal pool restoration and/or preservation areas a minimum of once

Responses

A-48. Refer to response A-29 and A-31.

A-49. Refer to response A-29

Comments

per week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately.

b. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.

c. Train all contractors and construction personnel on the biological resources associated with this project and ensure that training is implemented by construction personnel. At a minimum, training shall include (1) the purpose for resource protection; (2) a description of the vernal pool species and their habitat(s); (3) the conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, and vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing); (4) environmentally responsible construction practices as outlined in measures 5, 6, and 7; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and (6) the general provisions of the project's mitigation monitoring and reporting program (MMRP), the need to adhere to the provisions of FESA, and the penalties associated with violating FESA.

d. Halt work, if necessary, and confer with the City to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to the City within 24 hours of its occurrence.

e. Submit regular (e.g. weekly) letter reports to the City during project construction and a final report to the City following completion of construction. The final report shall include as-built construction drawings with an overlay of habitat that was impacted and avoided, photographs of habitat areas that were avoided, and other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with all conservation measures was achieved.

5. The following conditions shall be implemented during project construction:

a. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint.

b. The project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in

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A - 49

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	<p>sealed containers and regularly removed from the site.</p> <p>c. Disposal or temporary placement of excess fill, brush, or other debris shall be limited to areas within the fenced project footprint.</p> <p>6. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering the vernal pools or their watersheds and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from the vernal pools or their watersheds. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. A spill kit for each piece of construction equipment shall be on-site and must be used in the event of a spill. "No-fueling zones" shall be designated on construction plans"</p>
Mitigation Measure #3:	<p>Prior to the issuance of any grading permit, Notice to Proceed (NTP), or Pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:</p> <p>No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the city manager:</p> <p>A. 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 [dB(A)] hourly average for the presence of the coastal California gnatcatcher.</p> <p>Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:</p> <p>i. Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted.</p>

Responses

A-50. Refer to response A-31

Comments

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 dB (A) hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB (A) hourly average 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 representative 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 dB(A) hourly average 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 dB (A) 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 Montgomery Field Airport determines 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 representative, 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

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A - 51

	<p>placement of construction equipment and the simultaneous use of equipment.</p> <p>B. 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 which demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:</p> <p>i. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A shall be adhered to as specified above.</p> <p>ii. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.</p>
	<p>Mitigation Measure #4: CDFW recommends that the CAGN measure and Vernal Pool Avoidance measure be included as avoidance and minimization measures for the Project and described in the text of the MND.</p>

Responses

A-51. All Avoidance and Minimization measures identified in the Biological Technical Report will be required and implemented. Implementation of these measures will ensure all impacts are avoided or mitigated below a level of significance. Biological Technical Report measures BIO-3 and BIO-4 will be included as a condition of the Site Development Permit approval.

Comments

Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations facility Project - Phase II

Summary

SCH Number	2020080438
Lead Agency	San Diego, City of (<i>City of San Diego</i>)
Document Title	Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations facility Project - Phase II
Document Type	MND - Mitigated Negative Declaration
Received	8/26/2020
Project Applicant	City of San Diego, Real Estate Assets Department, Airports Division - Montgomery Field Airport
Present Land Use	Unzoned / Industrial / Airport

Document Description	A SITE DEVELOPMENT PERMIT for impacts to Environmentally Sensitive Lands for the project which will provide new hangar space and a concrete apron to accommodate five helicopters, parking and shelter for a single Heli tender and two fueling tender vehicles at Montgomery-Gibbs Executive Airport. The area of new hangar space will be approximately 32,000 SF, of which approx. 16,500 SF is existing disturbed and/or impervious area. The new hangar space includes a hangar support area for maintenance offices, overhaul, avionics and storage rooms. The new apron area will be approximately 65,000 SF of 5000 PSI concrete, of which approx. 9,300 SF is existing disturbed and/or impervious area. The project includes two above-ground fuel storage tanks, each with 12,000-gallon capacity (24,000 gallons total). This facility will support and accommodate 24-hour staffing that includes one battalion chief, two captains, two pilots, and four firefighters. The staging area for the project will be placed on existing paved and/or disturbed area, and is designed to be approximately 4,000 SF. Construction access to the site will be via the airport perimeter gate at 4302 Ponderosa Avenue, and an unnamed access road which leads directly to the site. The project will address any damages to the access road sustained from construction activities. The rehabilitation of the existing access road will include a two-inch overlay of asphalt material in any areas deemed necessary and will not impact any undisturbed areas. The project will require a Site Development Permit for impacts to Environmentally Sensitive Lands (ESL) in the form of biological resources.
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Contact Information	Sara Osborn City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101 Phone : (619) 446-5381 SOsborn@sandiego.gov
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Location

Coordinates	32°18'27"N 117°14'16"W
Cities	San Diego
Counties	San Diego
Regions	Citywide
Cross Streets	John J. Montgomery Drive and Gibbs Drive

Responses

AA. State Clearinghouse

AA-1. This letter acknowledges compliance with the State Clearinghouse review requirements for draft environmental documents. No further response is required.

Comments



San Diego County Archaeological Society, Inc.

Environmental Review Committee

28 August 2020

To: Ms. Sara Osborn
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Mitigated Negative Declaration
Montgomery-Gibbs Executive Airport Fire-Rescue Operations – Phase II
Project No. 625280

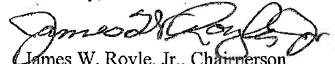
Dear Ms. Osborn:

I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

B-1 { Based on the information contained in the DMND and the historical resources report for the project as posted on the City's website, we agree with the conclusion that the likelihood of encountering archaeological resources is low. Nevertheless, the DMND includes a Native American monitoring program. We concur in that mitigation program as specified.

Thank you for the opportunity to offer our comments on this DMND.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: RECON
SDCAS President
File

Responses

B. James Royle - San Diego County Archaeological Society

B-1. Comments noted. The comments do not address the adequacy of the Draft MND. No further response is required.

Comments

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



September 4, 2020

Sent via email: DSDEAS@san-diego.gov

City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II

Dear Mr. Sweeney,

This letter is written on behalf of Rincon Band of Luiseño Indians, (“Rincon Band” or “Band”), a federally recognized Indian Tribe and sovereign government.

The Band has received the notification for the above referenced project. The location identified within project documents is not within the Band’s specific Area of Historic Interest (AHI).

C - 1 At this time, we have no additional information to provide. We recommend that you directly contact a Tribe that is closer to the project and may have pertinent information.

Thank you for submitting this project for Tribal review. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635 or via electronic mail at crd@rincon-nsn.gov.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Deneen Pelton

Administrative Assistant
Cultural Resources Department

Responses

C. Deneen Pelton - Rincon Band of Luiseño Indians

C-1. Comments noted. The comments do not address the adequacy of the Draft MND. No further response is required.

Bo Mazzetti
Chairman

Tishmall Turner
Vice Chair

Laurie E. Gonzalez
Council Member

Alfonso Kolb, Sr.
Council Member

John Constantino
Council Member

Comments



September 28, 2020

Sara Osborn
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project-Phase II
Project No. 625280

Dear Sara Osborn:

D - 1 [Thanks for the opportunity to comment on the Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project-Phase II Mitigated Negative Declaration (MND). The San Diego Audubon Society advocates on the behalf of wildlife and the environment. The Mission of San Diego Audubon is to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and advocate for a cleaner, healthier environment. The following are some concerns SDAS has after reviewing the MND, and we hope they can be addressed before the final version is released and approved. Questions are in bold providing easier location.

D - 2 [In the Mitigated Negative Declaration, the biologist qualifications need clarification. In BIO-2 Biological Resources Protection, Biologist Verification and qualification for the Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The biologist(s) shall be knowledgeable of vernal pool species biology and ecology, and burrowing owl biology and ecology. Since the Project Biologist is an extremely important part of the success of the mitigation process it would be proper if the qualifications were better defined then described in this report. The term "shall be knowledgeable" is vague and subjective. A defined qualification resume with a perspective on how the biologist will be chosen as the duties put within their authority are wide-ranging. **Can a comprehensive qualification for the project biologist be defined in this report as to have the expertise in wildlife, avian, plant, and vernal pool species and ecology?**

D - 3 [The initial Study included in the MND section has some categories needing clarification. On the bottom of page 32, "The municipal code requires this project to obtain a site development permit. California Gnatcatcher (CAGN) preconstruction surveys are required as conditions of project approval, therefore no impacts to CAGN would result with project implementation." **Is this stating that a preconstruction survey alone determines that no CAGN impacts would result from the project implementation?** This is a false premise as the survey would determine if significant impacts are present and if mitigation is required. **Will this be corrected or clarified so the impacts can be properly addressed?** On the bottom of page 35 follows the same logic, finding that a preconstruction survey that hasn't been performed leads to the project not being in conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation

858-273-7800 • 4010 Morena Blvd., Suite 100, San Diego, CA 92117 • Fax 858-273-7801 • www.sandiegoaudubon.org

Responses

D. John Peugh - San Diego Audubon Society

D-1. Comment noted, the comment is an introductory summary.

D-2. As outlined in the MND, the contractor will be required to hire a qualified project biologist to ensure the required measures are implemented and followed. Biologist resumes are reviewed by both the Development Services Department's Mitigation and Monitoring Coordinator and Engineering & Capital Projects environmental staff to ensure their qualifications to assist in implementing the MND Mitigation, Monitoring, and Reporting Program and Site Development Permit project conditions. The City will also have a City biologist from the Engineering and Capital Projects Department assigned to this project to help ensure compliance is achieved.

D-3. As described in the MND and Biological Technical Report impacts to California gnatcatcher (CAGN) would be avoided through implementation of the MHPA Land Use Adjacency Guidelines, which would be required as a condition of Site Development Permit (SDP) approval. If work occurs during the CAGN nesting season, protocol surveys will be required to determine presence. As described in the Biological Technical Report, if CAGN are identified adjacent to the project area, avoidance measures will be implemented to ensure impacts are avoided. As stated in the MND, no significant impacts to CAGN are anticipated with implementation of these avoidance measures through a condition of approval. Note that no construction can occur without full approval of the SDP.

Comments



plan. The cart before the horse analogy seems fitting here. Please clarify or correct these incorrect conclusions. **Will this report correct a CAGN survey will need to be performed to determine impacts and appropriate mitigation developed? Then to properly ascertain if any conservation ordinances or plans are in conflict with project implementation?**

- D - 4 In the MND section, page 7, a summary Avian Protection Requirements claims avoidance of any direct impacts to avian species identified as listed, candidate, sensitive, or special status in the MSCP (California Gnatcatcher (*Poliptila California*- **CAGN**) and Western Burrowing Owl (*Athene cunicularia*- **BUOW**). The compliance to CEQA regulations are not properly adhered to in this report. The planned mitigation to avoid impacts are to prepare a mitigation plan if surveys identify impacts. Formulating a mitigation plan in the future is not mitigation. CEQA requires direct, indirect and cumulative impacts to be identified and if significant, mitigation measures are to be disclosed. The plan states the mitigation plan will be submitted to the city for review and approval, CEQA requires these plans to be released to the public for review with the opportunity to provide comments and concerns. **Will the MND section be updated to comply with CEQA requirements, and the mitigation measures identified now for public review?**
- D - 5
- D - 6 There is a continuation in the MND section for Avian Protection requirements of applying mitigation on a need to know basis. Under Monitoring, the project biologist.... "shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas...", under Resource Identification... "project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined." These are discoveries and impacts that an EIR is designed to identify and plan mitigation for. **Will this MND be prepared so impacts and mitigation are presented here as CEQA requires instead of applying at a later date during project implementation?**
- D - 7 Section BIO-3 details mitigation for **BUOW** impacts and avoidance measures. There are some areas where a breakdown in communication could cause species harm. Step 3 on page 9 should state construction activities will halt until BUOW presence has been resolved. Step 2 on top of page 10 the City's MMC should acknowledge notification of new BUOW presence. Step B on the top of page 11 should avoid BUOW eviction as fledgling no longer depending on the burrow could be mistaken and fatal. Step 3 on page 11 there should be a tighter time frame communication between survey/eviction reports to the City's MMC and acknowledgment of receipt as habitat damage could occur without proper oversight during communication delay.
- D - 8 There is no proper **CAGN** survey described in the Biological Section. It is noted in section 5.4, "A California gnatcatcher was observed foraging in habitat adjacent to the project footprint". Also noted in Section 5.4.7 "California gnatcatchers are known to occur on MYF". Section 6.1.2.1 simply declares no significant impacts to CAGN. The initial report counted on preconstruction surveys and future mitigation measures so no impacts declaration seems premature and invalid for a Federally- and State-protected, MSCP-covered species. The CAGN survey and impacts analysis needs correction so a proper analysis of

Responses

D-4. Comment noted. Comment restates text from MND.

D-5. Avian impacts would be avoided through a pre-construction nesting survey as described in the MND. Additionally, the discretionary permit includes, as a condition of project approval, that the applicant(s) is required to adhere to all state and federal laws regarding the including the federal MBTA and the California Fish and Game Code, in particular, Section 3503.

D-6. These MND requirements are based on the project biological report of a field survey. An EIR would also be based on a biological report and therefore would have the same requirements. Since biological conditions at the time of construction can differ from the conditions at the time of the biological survey, a qualified biologist (overseen by Development Services Department's Mitigation Monitoring Compliance section) is needed to assess the site before and during construction, as required by the MND.

D-7. This is the standard mitigation for Burrowing Owl (BUOW) as agreed upon by City Multiple Species Conservation Program staff and state and federal wildlife agencies. Please note that these individual concerns are comprehensively addressed by the standard BUOW mitigation. In addition, the qualified biological monitor is required to attend the pre-construction meeting and inform construction personnel about the City's BUOW requirements and subsequent survey schedule; and is required to conduct a Worker Environmental Awareness Program (WEAP) training for the representatives of the City applicant Department and construction personnel to not only enhance the awareness and knowledge of the BUOW mitigation program, but to ensure a coordinated, informed, and seamless resource protection effort.

D-8. Based on observations of California gnatcatcher (CAGN), suitable habitat near the project area was considered occupied. As described in the MND and the Biological Technical Report, impacts to CAGN would be avoided through compliance with the City's MHPA LUAG. Refer to Response D-3.

Comments



impacts can be vetted in this MND. **Will the MND be updated to fix the flaws in the CAGN survey and impact analysis?**

D - 9 [The Biological Resources Report lays out many instances for temporary and permanent fencing for vernal pool protection, human and pet deterrence to sensitive biological habitats. Section 4.3.4 details the fencing to be barbless chain link fences that allows wildlife movement. This section does not state that all fencing, temporary or permanent are wildlife friendly that will not ensnare, causing injury or death. The fencing should be approved by a wildlife biologist with knowledge of wildlife species and habitat connectivity within the project site. **Will this section be updated to address these concerns?**

D - 10 [Thank you for the opportunity to comment on this Mitigated Negative Declaration. Please notify us of any updates to the project.

Sincerely,

A handwritten signature in black ink that reads "James A. Peugh". The signature is written in a cursive, flowing style.

James A. Peugh
Conservation Chair
peugh@cox.net

Responses

D-9. This comment refers to section 4.3.4 of the vernal pool mitigation plan. Both permanent and temporary fencing proposed was chosen specifically to protect vernal pools and sensitive species from adjacent development and allow wildlife movement between the site and adjacent open space. Fencing would be installed under the supervision of the qualified biologist as described in mitigation measure BIO-2.

D-10. Comments noted. No further response is required.

Comments

Montgomery-Gibbs Environmental Coalition

P.O. Box 231294 - San Diego, California 92193 - (619) 736-9522 - mgecsd.org

September 25, 2020

Sara Osborn, City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II -
Project No. 625280, Mitigated Negative Declaration (MND) comments

Dear Ms. Osborn:

- E - 1 [Montgomery-Gibbs Environmental Coalition (MGEC) supports the Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II. However, MGEC has the following concerns about the project.
- E - 2 [1. The Mitigated Negative Declaration declares that construction of the project falls within the Montgomery Field Master Plan. That being the case, the Fire-Rescue Air Operations Facility Project should have been included in the Master Plan PEIR. Since it was not, and because of the magnitude of the Fire-Rescue Air Operations Facility Project, a Mitigated Negative Declaration is not sufficient. The Fire-Rescue Air Operations Facility Project needs to have a comprehensive EIR pursuant to the California Environmental Quality Act (CEQA).
- E - 3 [It is acknowledged that a NOTICE OF RIGHT TO APPEAL ENVIRONMENTAL DETERMINATION regarding the Fire Rescue Air Operations Facility Project was noticed in some manner by the City Project Manager on December 6, 2017. However, the manner in which it was noticed was not sufficient to reach and notify ordinary members of the communities which surround Montgomery Field so that they could give a response in a timely manner. Montgomery-Gibbs Environmental Coalition only found out about the project recently after requesting documents from the City under the Freedom of Information Act.
- E - 4 [2. There is concern in regards to relocation of Vernal Pools, of the legality and ethicality of moving endangered species from their native ground where they have survived for eons, and transferring them to a location that appears appropriate but has not successfully supported continued life for a monitored protracted period of time. The City does not appear to have identified funding or escrowed funding for such a move and monitoring as required by the City of San Diego Vernal Pool Habitat Conservation Plan.
- E - 5 [3. There is concern that the City of San Diego will not be able to fulfil the requirement stated in the MND that a Project Biologist will be available to implement the project's biological monitoring program. The reason for concern is that Airports Biologist III Cindy Dunn is no longer employed by the city and the City of San Diego has implemented a hiring freeze. It is recognized that the city has other staff biologists, but there is still concern that some monitoring may "fall through the cracks" due to a heavy work load caused by the hiring freeze, especially since environmental impact of the project will only be 'Less Than Significant' if mitigation is incorporated.

Thank you for your consideration of MGEC comments regarding this project,

Sandra Stahl, MGEC Executive Director

Responses

E. Sandra Stahl - Montgomery-Gibbs Environmental Coalition

E-1. Comment noted.

E-2. The Notice of Preparation for the Programmatic EIR for the Montgomery-Gibbs Master Plan shows this project on its "Proposed Airport Plan" as the "Potential San Diego Fire Department Expansion +/- 33000 Square feet." The project is also shown on page 4 of 12 of the Airport Layout Plan as being a proposed airport project for the near term (0-5 years)

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect to Biological Resources and Tribal Cultural Resources. However, with implementation of mitigation measures the project would reduce impacts to below a level of significance. Therefore, an EIR was not required.

E-3. The comment does not address the adequacy of the MND. This comment addresses a different project, not the project analyzed under this MND.

E-4. The re-establishment of vernal pools to mitigate for pools impacted on Montgomery-Gibbs Executive Airport will occur in accordance with the City's Vernal Pool Habitat Conservation Plan (VPHCP). The VPHCP was developed in partnership with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife. The VPHCP includes methods based on the best science available, to re-establish vernal pools in an area known to previously support vernal pools and the sensitive species associated with them. The restoration and monitoring of vernal pools will be conducted in accordance with the Biological Guidelines and included in the construction contract; the City's contracting policies require bonding to ensure work is completed or funding remains with the project.

E-5. As stated in the MND, Mitigation Measure BIO-2, a qualified biologist would ensure that the required measures, including the monitoring program, are implemented. The City will also have a City biologist from the Engineering and Capital Projects Department assigned to this project to facilitate compliance is achieved.

Comments

Sara Osborn
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Project Name: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II, Project No. 625280

September 28, 2020

To Sara Osborn,

F - 1

I am writing in concern for the long term impact to Vernal Pools and associated fauna, and bird species under the Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II, Project No. 625280, as the overall direct effects of climate change specifically to wildlife and habitat are not addressed in this proposal. The effects of climate change go beyond greenhouse gas emissions and will create direct effects on individual species (IPCC 2014) that should be considered when habitat is destroyed. We request that species and habitat assessments address current and future impacts from climate change for all species and habitat that will be impacted by this project. As this project will destroy existing habitat that cannot be replaced, the impacts of climate change on all of the species should be considered as this may contribute negatively to the population of currently imperiled and species that may be doing well but may decline rapidly in the future from Climate Change.

F - 2

According to the World Wildlife Fund, the world's wildlife population has fallen by an average of 68% between 1970 and 2016, due to altering natural habitat to human use. In this same study, 84% of freshwater animals have declined, which includes fauna in vernal pools. As Vernal pools are sensitive to climate change (Brooks 2009) and will be destroyed with this project, how will vernal pools be directly impacted with Climate Change? How will the fauna that use the vernal pool habitat be impacted by Climate Change? How will the destruction of these animals and habitat with this project affect local populations considering the impacts of climate change? How will the destruction of these animals and habitat with this project affect statewide populations considering impacts from climate change? Please provide details using climate scenarios up to the year 2100 to answer these questions.

F - 3

According to a study from 2019, nearly 3 billion bird species across North America have declined 29% since the 1970s (Rosenberg et al. 2019). Two-thirds of bird species in the United States are vulnerable to changes from Climate Change in the future and are at risk of extinction, according to the Survival By Degrees Report by Audubon. As this proposed project will take place in San Diego County which boasts the highest bird biodiversity in the United States with 546 recorded species according to ebird in 2020, we request that you specifically address the impact of this project on the following individual bird species that are of conservation concern designated as Federal Endangered Species, State Endangered Species, USFWS Birds of Conservation Concern, and that are included on the California Watch List. The proposed project does not adequately address the impact on these individual species to the local population in San Diego County and the larger statewide population. Additionally, impacts from climate change are not addressed any of these species and we request further information regarding future impacts on the population of these bird species and the habitat up to the year 2100.

Responses

F. Lesley Handa - Handa Ornithology Lab

F-1. CEQA Statute Section 21083 directs the CEQA Guidelines to "include criteria for public agencies to follow in determining whether or not a proposed project may have a "significant effect on the environment." The Statute does not contain language directing agencies to analyze the environment's effects on a project. Therefore, effects of climate change on the project is not required and an impact from the environment on the project does not constitute an impact under CEQA.

Under CEQA, potential climate change impacts are required to analyze GHG emissions for new projects. The City's Climate Action Plan (CAP) is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulative considerable if it complies with requirements of the CAP. The project is compliant with the City's Climate Action Plan, demonstrated through the Climate Action Plan Consistency Checklist, and would not be cumulatively considerable and therefore GHG impacts were determined to be less than significant.

The Biological Resources Section IV in the MND describes the biological impacts of the project and how the impacts are mitigated.

F-2. The comment does not address the adequacy of the Draft MND. Regarding climate change, the City's Vernal Pool Habitat Conservation Plan addresses potential impacts to vernal pools from climate change. This project was designed to be consistent with the VPHCP and comply with the requirements of the VPHCP to ensure the project does not result in significant impacts to local or regional populations of sensitive vernal pool species. Since the VPHCP addresses potential impacts from climate change and the project is consistent with the VPHCP, the project is not expected to have an effect on the long-term populations of local or regional vernal pool species when combined with potential impacts from climate change.

F-3. The Biological Resource Report prepared for the project addresses potential impacts to avian species. CEQA analysis is based on the potential impacts of the project on the environment, the impact from the environment on the project does not constitute an impact under CEQA. The project is compliant with the City's Climate Action Plan, demonstrated through the Climate Action Plan Consistency Checklist, and would not be cumulatively considerable and therefore GHG impacts were determined to be less than significant.

Comments

F - 4 As the impacted area is considered aridlands, 44% of all bird species will have medium to high vulnerability to climate change (NABCI 2010). Habitat will undergo major changes due to climate change and habitat quality is expected to degrade as there is a predicted increase in drier, warmer, and more variable habitat with Climate Change (NABCI 2010). As aridlands are highly susceptible to non-native invasive species with Climate Change (NABCI 2010), loss in any existing habitat would be detrimental to the current species using this area, especially sensitive species that are conservation concern, including the Federally Threatened California Gnatcatcher which also a California Species of Special Concern. If this project moves forward, how will losses be mitigated for the local population of the California Gnatcatcher in San Diego County? How will losses be mitigated for the statewide population of this species? How will losses be mitigated for this species from the impact of climate change? Please provide full detail addressing each question including information for this species that considers several climate scenarios projected into the future up until the year 2100.

F - 5 The habitat of the Burrowing Owl, a USFWS Bird of Conservation Concern has been significantly reduced due to development across the county. Per the San Diego Bird Atlas, this species suffers from the factors that afflict other grassland birds: not only direct loss of habitat but high sensitivity to habitat fragmentation, the proliferation of terrestrial predators, and high mortality from collisions with cars (Unitt 2004). If this project moves forward, how will the losses affect the location population of Burrowing Owls here in San Diego County? How will these losses directly affect the larger Burrowing Owl population statewide? How will you mitigate the potential loss of habitat due to climate change for the Burrowing Owl if the habitat is destroyed? Please provide answers in full detail using climate scenarios projected into the future up until the year 2100.

F - 6 Thank you for the opportunity to comment and for your time and consideration. Please notify me of any updates to this project as I can be reached at HandaornithologyLab@gmail.com.

Sincerely,



Lesley Handa
Handa Ornithology Lab

REFERENCES

Brooks, R.T., 2009. Potential impacts of global climate change on the hydrology and ecology of ephemeral freshwater systems of the forests of the northeastern United States. *Climatic Change*, 95(3-4), pp.469-483.

IPCC, 2014: *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland, 151 pp.

North American Bird Conservation Initiative US Committee, 2010. The state of the birds 2010 report on climate change, United States of America. *Washington, DC: US Department of the Interior*.

Rosenberg, K.V., Dokter, A.M., Blancher, P.J., Sauer, J.R., Smith, A.C., Smith, P.A., Stanton, J.C., Panjabi, A., Helt, L., Parr, M. and Marra, P.P., 2019. Decline of the North American

Responses

F-4. CEQA analysis is based on the potential impacts of the project on the environment, the impact from the environment on the project does not constitute an impact under CEQA. The project is not required to address statewide impacts and provide statewide mitigation. California Species of Special Concern are addressed on a project level in the Biological Resource Report.

As described in the Biological Resource Report, this project will not result in a loss of habitat with the potential to support the California Gnatcatcher (CAGN). The City's Multiple Species Conservation Program (MSCP) analyzed potential impacts to avian species at a regional level and provides measures to ensure avian species remain stable and increase; this project has been designed and developed to be consistent with the City's MSCP. This project does not impact CAGN or CAGN habitat.

F-5. As described in the Biological Resource Report, this project will not result in impacts to Burrowing Owl. Section IV(a) Biological Resources states indirect impacts to western burrowing owl would be avoided and minimized through implementation of the MHPA land use adjacency guidelines and Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures. These measures are included as conditions of the Site Development Permit and as Mitigation Measures BIO-2 and BIO-3 and would reduce the level of impact to less than significant.

F-6. Comment noted.

Comments

avifauna. *Science*, 366(6461), pp.120-124.

Unitt, P., 2004. San Diego County Bird Atlas. San Diego, CA: San Diego Natural History Museum.

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Comments

Sara Osborn
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

September 26, 2020

Re: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project-Phase II
Project No. 625280

Dear Sara Osborn:

- G - 1 In the Mitigated Negative Declaration, the biologist qualifications need clarification. In BIO-2 Biological Resources Protection, Biologist Verification and qualification for the Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The biologist(s) shall be knowledgeable of vernal pool species biology and ecology, and burrowing owl biology and ecology. Since the project Biologist is an extremely important part of the success of the mitigation process it would be proper if the qualifications were better defined then has been described in this report. The term "shall be knowledgeable" is vague and subjective. There should be a defined qualification resume with a perspective on how the biologist will be chosen as the duties put within their authority are wide-ranging. **Can a comprehensive qualification for the project biologist be defined in this report as to have the expertise in wildlife, plant, and vernal pool species and ecology?**
- G - 2 In BIO-4 Revegetation of Temporary Impacts, it states that disturbed soil will receive a native low-grow upland seed mix shall be applied via hydroseed to all areas temporarily impacted. BIO-6 states the project biologist will be responsible for developing the plant palette. This highlights the issue the project biologist qualification does not mention plant biology expertise and seed mix mentioned is void of any information of what it contains. Disturbed soil offers opportunities for invasive plant species to take root and compete with disturbed native plant species. Revegetated area will be maintained and monitored for 25 months for successful erosion control. **Will the plant palette be developed by a plant biologist with expertise in vernal pool ecology and oversee the monitoring process?**
- G - 3 In Section 6.3.6 Invasive Species states that no invasive plant species shall be introduced into areas adjacent to the MHPA. It also states that the projects would not result in any significant impacts due to invasive species. However, in section 6.4 MHPA – Compatible Land Uses, the access road leading from Ponderosa Ave to the project area crosses through the MHPA. This existing road will provide construction access to the project area. The vast construction equipment coming into the project site on this road will provide ample opportunities for introduction of invasive species to disturbed soil. **Will this report be updated to reflect the opportunities for invasive species to enter MHPA covered land and the project site and provide mitigation for these impacts?**
- G - 4 In the Mitigated Negative Declaration, four sensitive plant species, Ashy spike moss (*Selaginella cinerascens*) CA Rare Plant Rank 4.1, Orcutt's bodiaea (*Brodiaea Orcuttii*) 1B.1, Graceful tarplant (*Holocarpha virgata* ssp. *Elongate*) are identified with one species missing. Please include 5.4.4 San Diego mesa mint (*Pogogyne abramsii*) as identified in section 5.4.4, is a Federally- and State-endangered, California Rare Plant Rank 1B.1 (California Native Plant Society, 2001), VPHCP-covered and narrow endemic species. Section 4.2 states direct impacts are not significant and indirect impacts will be

Responses

G. John Riedel

- G-1. (Cross Reference D-1) As stated in the MND and Biological Resource Report, the contractor will be required to hire a qualified project biologist to ensure the required measures are implemented and followed. Project biologists are required to present their resume either at the pre-construction meeting for review and approval by MMC and Engineering & Capital Projects staff. The City will also have a City biologist from the Engineering and Capital Projects Department assigned to this project to help ensure compliance is achieved.
- G-2. The plant palette will be developed by a qualified biologist and will require approval by the City (biologist, Development Services Department).
- G-3. The Biological Resource Report includes measures (BIO-3) to prevent introduction of invasive species to the project area. BIO-3 listed in the Biological Technical Report is an Avoidance and Minimization measures and will be included as a condition of the Site Development Permit.
- G-4. San Diego Mesa Mint will not be directly impacted by the project; therefore, it was not included in the list of plant species to be directly impacted by the project. Please refer to the Biological Resource Report Section 6 (page 15) and Section 7 (page 26). Significant impacts to San Diego Mesa Mint will be avoided through compliance with the VPHCP and MHPA Land Use Adjacency Guidelines.

Comments

G - 5

mitigated in accordance with MHPA land use adjacency guidelines and the Vernal Pool Habitat Conservation Plan. **Can it be provided what section and what page number in these Guidelines/Plans provide the guidelines that will eliminate all impacts to these sensitive plant species?**

G - 6

In Section 6.1.1.3 Sensitive Species states direct impacts to 3 plant species mentioned above, and indirect impacts to San Diego mesa mint. Section 6.2 states implementation of this project will impact six vernal pools. The facts being San Diego mesa mint is a VPHCP-covered and narrow endemic species. **How will there be direct impacts to these vernal pools yet have no direct impacts to San Diego mesa mint?** Due to the sensitive nature of this species any indirect impacts could be reasonably considered to be direct impacts. Measure BIO-2 is referenced to avoid impacts yet does not list any protections or clear mitigation measures for this MSCP-covered species. **Will this report be updated to state direct impacts to San Diego mesa mint and clear mitigation measures that will lessen these impacts to less than significant?**

G - 7

Section 6.1.1.3.2 states Orcutt's brodiaea was detected within the project footprint and approximately 133 individuals will be impacted by this project. It is recognized as a MSCP-covered species with a California Rare Plant Rank 1B.1 plant. The reasoning for why the impacts would not be significant are invalid. CEQA requires protections for impacts to biological resources. The argument that it occurs outside the MHPA or not located in a certain population does not render the impacts to this population not significant. CEQA requires it be recognized and impacts to be avoided or properly mitigated for. **Will this report be updated to detail protections for the this MSCP-covered species?**

G - 8

In the Mitigated Negative Declaration Section, page 7, are a description of monitoring activities by the project biologist during construction. The sentence of concern is, "The Qualified Biologist shall periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust." As dust can cause profound harm to sensitive plant species, a more robust and effective strategy should be developed to prevent dust impacts, in addition to random inspections by the project biologist. At the stage of inspection, harmful effects might be irreversible. **Will a more effective dust impact protocols be developed to protect sensitive plant species?**

Thank you for the opportunity to comment on this Mitigated Negative Declaration. I hope they will be considered for the final report.

Regards,

John Riedel
Jriedel8837@gmail.com

Responses

G-5. Please refer to the Biological Resource Report Section 6 (page 15) and Section 7 (page 26). The VPHCP requires indirect impacts to conserved vernal pools to be minimized by requiring development projects adjacent to the Preserve or MHPA to comply with the Land Use Adjacency Guidelines and the Avoidance and Minimization Measures in Section 5.2.1 of the VPHCP. Projects occurring adjacent to the City's MHPA, must adhere to the City's MHPA land use adjacency guidelines as outlined in section 1.4.3 of the City's MSCP Subarea Plan.

G-6. As described in the Biological Resource Report (Section 5.4.4 and Figure 5), the vernal pools being impacted are not occupied by San Diego Mesa Mint. As defined by the City's Biology Guidelines (2018) a direct impact is a physical change in the environment which is caused by and immediately related to the project; this project does not directly impact San Diego Mesa Mint. Measures BIO-2 and BIO-3 in the Biological Resource Report provide measures to ensure indirect impacts to sensitive biological resources are avoided.

G-7. As stated in the Biological Resource Report (Section 6.1.1.3.2) impacts to this species are consistent with the City's MSCP and therefore impacts to this species are mitigated through compliance and implementation of the MSCP.

G-8. The Biological Resource Report includes measures to ensure dust is controlled to prevent potential indirect impacts to adjacent biological resources. The project will also be required to comply with the Regional Water Quality Control Board General Construction Permit 2009-0009-DWQ, which will require a water pollution control plan and dust suppression.

INITIAL STUDY CHECKLIST

1. Project title/Project number: Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II/ PTS# 625280
2. Lead agency name and address: City of San Diego, Development Services Department, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Sara Osborn/ (619) 446-5381
4. Project location: The project site is located on Montgomery-Gibbs Executive Airport, east of SR-163, west of Ruffin Road, south off Balboa Avenue, and north of Aero Drive. Fire-Rescue Air Operations Phase 2 hangar will be located north of the F.A.A. air traffic control tower, and east of Taxiway 'C'. (see Appendix B: Fire Rescue Air Operations – Phase II (PTS 625280) Overall Site Plan)
5. Project Applicant/Sponsor's name and address: City of San Diego, Real Estate Assets Department, Airports Division - Montgomery Field Airport, Attn: Jorge Rubio, Airports Program Manager, 3750 John J. Montgomery Drive, San Diego, CA 92123-1769, (858-573-1436).
6. General/Community Plan designation: The Kearny Mesa Community Plan implementation element states that, "Development of Montgomery Field is to be reviewed for consistency with the Montgomery Field Airport Land Use Compatibility Plan (ALUCP)."
7. Zoning: The project is located within Montgomery Field Airport and is unzoned.
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

This project will provide new hangar space and a concrete apron to accommodate five helicopters, parking and shelter for a single Heli tender and two fueling tender vehicles. The area of new hangar space will be approximately 32,000 SF, of which approx. 16,500 SF is existing disturbed and/or impervious area. The new hangar space includes a hangar support area for maintenance offices, overhaul, avionics and storage rooms. The new apron area will be approximately 65,000 SF of 5000 PSI concrete, of which approx. 9,300 SF is existing disturbed and/or impervious area. The project includes two above-ground fuel storage tanks, each with 12,000 gallon capacity (24,000 gallons total). This facility will support and accommodate 24 hour staffing that includes one battalion chief, two captains, two pilots, and four firefighters. The staging area for the project will be placed on existing paved and/or disturbed area, and is designed to be approximately 4,000 SF.

Construction access to the site will be via the airport perimeter gate at 4302 Ponderosa Avenue, and an unnamed access road which leads directly to the site. The project will address any damages to the access road sustained from construction activities. The

proposed Air Operations site has only one (1) paved access road to and from the public right-of-way. This access road contains several existing utilities such as; Telecomm/Data, underground power, and fire water service. The proposed work will either extend, replace, and/or re-route some of the utilities to the best connection points for both the Air Operations Facility and the adjacent FAA Control Tower. The existing condition of the single access road is in need of repair and would require further maintenance due to construction activities and extended use. The proposed work will grind down the top 2" of asphalt and provide adequate trenching for the proposed utilities. Once utility work is completed, the access road will be paved with a new layer of asphalt pavement. All utility work and paving is proposed within previously disturbed and developed areas. In addition, the access road will be lined, on both sides, with silt fence and gravel bags for sediment control and to protect the adjacent sensitive habitats.

During construction, all laydown areas and storage of equipment/materials will be located in previously disturbed or paved areas within the area of impact identified in the biological technical report. Material storage shall have proper construction BMPs, including but not limited to; tarp covers for soil/rock piles, gravel bags, fiber rolls and spill containment areas. Frequent BMP and Biological monitoring will take place to ensure proper compliance to protect the adjacent sensitive habitats. The rehabilitation of the existing access road will include a two-inch overlay of asphalt material in any areas deemed necessary and will not impact any undisturbed areas.

The project will require a Site Development Permit (SDP) for impacts to Environmentally Sensitive Lands (ESL) in the form of biological resources.

9. Surrounding land uses and setting:

This project is in Council District 6 within the Kearny Mesa Community Planning Area. The project is located with the Montgomery-Gibbs Executive Airport, which is surrounded by a combination of existing commercial, residential, and industrial/business parks.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Federal Aviation Administration (FAA)
US Army Corps of Engineers
Regional Water Quality Control Board

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego notified the Lipay Nation of Santa Isabel, San Pasqual Tribe, and the San Pasqual Band of Mission Indians traditionally and culturally affiliated with the project area. During the 30-day notification period, it was identified that there could be potential impacts to Tribal

Cultural resources during ground-disturbing activities; so, archaeological monitoring (with a Native American present) during ground-disturbing activities was identified.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Noise | <input type="checkbox"/> Utilities/Service System |
| | | <input checked="" type="checkbox"/> Mandatory Findings Significance |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D)*. In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated”, describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

According to the City of San Diego Significance Determination Thresholds, projects that block public views from open space, roads, or parks of visual landmarks or scenic vistas would result in a significant impact. The project would be located adjacent to an existing Fire Rescue Air Operations building and north of the FAA Air Traffic Control Tower. The project is not located within a designated scenic vista as outlined in the Kearny Mesa Community Plan and no impact would occur.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not damage any existing scenic rock outcroppings, or historic buildings as none of these features are located within the boundaries of the project. The project is not located within or adjacent to a state scenic highway and therefore would not substantially damage such scenic resources. Therefore, no impacts would result.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project will not degrade the existing visual character or quality of the site and its surroundings because the project proposes to construct a helicopter hangar and apron attached to the existing Fire-Rescue air operations building and existing apron and parking pad. The proposed project is consistent with the General Plan and the Kearny Mesa Community Plan's Land Use designation, and the Montgomery Field Airport Land Use Compatibility Plan (ALUCP), which states aircraft repair services, repair garages, aircraft storage, and auto parking surface lots are consistent land uses at this site. Therefore, no impacts would result.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would include the installation of energy-efficient lighting fixtures and directional and shielded lighting to avoid unwanted light and glare effects. The project would also be subject to the City's Outdoor Lighting Regulations per Municipal Code Section 142.0740 and therefore, the project would have a less than significant impact to light or glare that would adversely affect day or nighttime views in the area and no mitigation would be required.

- II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site does not contain, and is not adjacent to, any lands identified as Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as show on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency. Therefore, the project would not result in the conversion of such lands to non-agricultural use. Therefore, no impacts would result.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Refer to response II (a), above. There are no Williamson Act Contract lands on or within the vicinity of the project. The project is consistent with the residential community plan land use designation and the underlying zone. The project would not conflict with any properties zoned for agricultural use or be affected by a Williamson Act Contract. Therefore, no impacts would result.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No designated forest land or timberland occur onsite as the project is consistent with the community plan. No impacts would result.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Refer to response II (c) above. Additionally, the project would not contribute to the conversion of any forested land to non-forest use, as the site and surrounding land uses do not contain forest land. No impacts would result.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Refer to response II (a) and II (c), above. The project and surrounding areas do not contain any farmland or forest land. No changes to any such lands would result from project implementation. Therefore, no impact would result.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991 and is updated on a triennial basis (most recently in 2016). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O3). The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

The project proposes to construct a helicopter hangar and apron attached to the existing Fire-Rescue air operations building and existing apron and parking pad. This project is consistent with the Public Facilities Services and Safety Element of the City's General Plan, the Kearny Mesa Community Plan, and Montgomery Field Airport Land Use Compatibility Plan (ALUCP). The project is not growth inducing. As such, the project is consistent with the region's air quality plan and therefore the project would be less than significant.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Short-term Emissions (Construction)

Project construction activities would potentially generate combustion emissions from on-site heavy-duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include excavation equipment,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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forklift, skip loader, and/or dump truck. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off-site. It is anticipated that construction equipment would be used on-site for four to eight hours a day; however, construction would be short-term and impacts to neighboring uses would be minimal and temporary.

Fugitive dust emissions are generally associated with land clearing and grading operations. Due to the nature and location of the project, construction activities are expected to create minimal fugitive dust, as a result of the disturbance associated with grading. Construction operations would include standard measures as required by the City of San Diego to reduce potential air quality impacts to less than significant. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Impacts related to short term emissions would be less than significant.

Long-term Emissions (Operational)

Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. The project proposes to construct a helicopter hangar and apron attached to the existing Fire-Rescue air operations building and existing apron and parking pad. The project is compatible with the Montgomery Field Airport Land Use Compatibility Plan (ALUCP) and the long-term emissions are not anticipated to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant. Overall, the project is not expected to generate substantial emissions that would violate any air quality standard or contribute to an existing or projected air quality violation; therefore, impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

As described above in Response III (b), construction operations may temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and implementation of Best Management Practices would reduce potential impacts related to construction activities to below a level of significance. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts would be less than significant. This project, helicopter hangar, in the long-term operation is not anticipated to generate odors affecting a substantial number of people. Therefore, impacts would be less than significant.

IV. BIOLOGICAL RESOURCES – Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

A Biological Technical Report (BTR) was prepared July 2020 by the City of San Diego for the proposed project. The survey for the BTR encompassed 11.7 acres, which included a 100-foot buffer and a focus on the 3.7 acre impact footprint. The project site lies within the boundaries of the City's Multiple Species Conservation Plan (MSCP) Subarea. Furthermore, the Multi-Habitat Planning Area (MHPA) is mapped on-site and adjacent to the project. The results of this analysis are discussed below.

Four sensitive plant species were observed within the project survey area. The project would directly impact three of the observed species including ashy spike-moss, Orcutt's brodiaea, and graceful tarplant. Direct impacts to these species are not considered significant. Indirect impacts to sensitive plant species would be minimized and/or avoided by implementation of the MHPA land use adjacency guidelines and Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures; these measures would reduce the level of impact to less than significant.

Indirect impacts to California gnatcatcher, western burrowing owl, and San Diego fairy shrimp would be avoided and minimized through implementation of the MHPA land use adjacency guidelines and Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures; these measures would reduce the level of impact to less than significant.

The municipal code requires this project to obtain a site development permit. California Gnatcatcher (CAGN) preconstruction surveys are required as conditions of project approval, therefore no impacts to CAGN would result with project implementation. The Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures will be conditions of project approval in the project's site development permit.

Mitigation measures and Avoidance and Minimizations measures are discussed in the Biological Technical Report. The Avoidance and Minimizations measures identified in the Biological Technical Report (VPHCP and MHPA Land Use Adjacency Guidelines) are conditions of the Site Development Permit and will be required and implemented during the project. The remaining recommendations

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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in the Biological Technical Report are included as Mitigation Measures. A Mitigation Monitoring and Reporting Program, as detailed within Section V of the Mitigated Negative Declaration would be implemented to reduce impacts related to Biological Resources to below a level of significance.

Therefore, the project would not have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

Five vegetation communities were mapped within the survey area and include Diegan coastal sage scrub, non-native grasslands, disturbed land, San Diego mesa hardpan vernal pool, and developed land. The project would result in direct impacts to one sensitive vegetation community, San Diego mesa hardpan vernal pool habitat (0.089 acre). These impacts would be mitigated at a 2:1 ratio, as required by the Biology Guidelines, for a required mitigation amount of 0.178 acres in accordance with the Vernal Pool Mitigation Plan for La Media Road Widening & Fire Rescue Air Operations Phase II (RECON 2020) and pursuant to the City's VPHCP and Biology Guidelines. The re-establishment and restoration of vernal pools, at the location known as the South Otay 1-acre parcels, will occur to satisfy the required mitigation requirements.

Table 7. Required Mitigation for Impacts to Vegetation Communities			
Vegetation Type	Direct Impacts (acres)	Mitigation Ratio	Required Mitigation
Developed (Tier IV)	1.747	0:1	0
Disturbed (Tier IV)	1.883	0:1	0
San Diego Mesa Hardpan Vernal Pool (Wetland)	0.089	2:1	0.178
Total	3.719	--	0.178

As detailed in the project BTR (City 2020) the project survey area is located within U.S. Fish and Wildlife Service designated critical habitat for spreading navarretia and San Diego fairy shrimp. The proposed project would directly impact 1.01 acres of land designated as critical habitat for spreading navarretia. The proposed project will not impact land designated as critical habitat for San Diego fairy shrimp. The proposed project impacts to critical habitat are consistent with the City's Vernal Pool Habitat Conservation Plan. The Vernal Pool Habitat Conservation Plan section 5.2.1 minimization measures will be conditions of project approval in the project's site development

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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permit. Restoration of vernal pools and vernal pool species as part of the mitigation described in Section VI(a) reduce the level of impacts to below a level of significance.

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

As detailed in the project BTR (City 2020), 0.089 acre of vernal pools within the project footprint were delineated as potential wetland waters of the U.S. and will be directly impacted by the proposed project. The project will be required to comply with the Clean Water Act and acquire permits from the U.S. Army Corps of Engineers and Regional Water Quality Control Board. In addition, impacts to 0.089 acre of vernal pools will be mitigated at a 2:1 ratio, as described in Section VI. a). Compliance with the Clean Water Act and mitigation for potentially significant impacts to wetlands would reduce impacts to less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site does not function as a wildlife corridor due to its location on an airport and proximity to existing development. The project is not expected to significantly impact a wildlife corridor or alter the local movement of wildlife, and thus would not be considered significant impact under CEQA. Impacts are less than significant and no mitigation is required.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project would not conflict with any local policies and/or ordinances protecting biological resources. No impact would result.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The City's MSCP Subarea Plan and Vernal Pool Habitat Conservation Plan has been prepared to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. This Subarea Plan describes how the City's portion of the MSCP Preserve, the MHPA, would be implemented. The MSCP identifies a MHPA that is intended to link all core biological areas into a regional wildlife preserve.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The project site lies within the boundaries of the City San Diego Multiple Species Conservation Plan (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP). The City's Multi-Habitat Planning Area (MHPA) is mapped onsite. MHPA Lands are those that have been included within the City's MSCP Subarea Plan and VPHCP for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. A field survey and a biological technical report was prepared by the City (2020) to assess the vegetation communities on site and determine what impacts would result through project implementation. Refer to Section IV(a – e), Biological Resources discussion for further details. Due to the presence of the MHPA, on and adjacent to the site, the project would be required to comply with the MHPA Land Use Adjacent Guidelines (Section 1.4.3) of the City's MSCP Subarea Plan to ensure that the project would not result in any indirect impacts to the MHPA. The project would also be required to comply with the VPHCP General Avoidance and Minimization Measures (Section 5.2.1) to avoid and minimize indirect impacts to vernal pools. The VPHCP section 5.2.1 minimization measures will be conditions of project approval in the project's site development permit. Per the MSCP, potential indirect effects from drainage, toxics, lighting, noise, barriers, invasives, and brush management from project construction and operation must not adversely affect the MHPA.</p> <p>More specifically, drainage would be directed away from the MHPA, and/or would not drain directly into these areas. The project's storm water drainage would capture all drainage within the project site and prevent it from entering the MHPA. Light would be directed away from the MHPA and be consistent with the City's lighting regulations which would require exterior lighting to be low-level lights and directed away from native habitat or shielded to minimize light pollution. Landscape plantings would consist of only native plant species. Brush Management Zone One would occur outside of the MHPA and within the development footprint. Brush Management Zone Two would not occur within the MHPA. In addition, no staging/storage area would be allowed to be located within or adjacent to sensitive biological areas and no equipment maintenance would be permitted. With respect to grading, the limits of grading would be clearly demarcated by the biological monitor to ensure no impacts occur outside those area delineated. Additionally, the project does not anticipate establishment of any new barriers that would affect the normal functioning of wildlife movements in the adjacent MHPA. The project would be consistent with the MHPA Adjacency Guidelines and indirect impacts to the MHPA would be avoided.</p> <p>The project is required to perform California Gnatcatcher preconstruction surveys as conditions of project approval.</p> <p>Furthermore, the project as designed would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p> <p>Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>				
<p>V. CULTURAL RESOURCES – Would the project:</p> <p>a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

The "Historical Resources Survey for the San Diego Fire-Rescue Air Operations Hangar Project" analyzed the potential for the project to impact historical resources. The report concluded the possibility of significant historical resources being present within the proposed project is considered low. The topsoil within the area of potential effect has been scraped away in the past, leaving no suitable areas where potentially significant pre-historic or historic cultural resources would be present. Therefore, the project will not cause a substantial adverse change in the significance of an historical resource as defined in §15064.5.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Please see discussion in V(a) above.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the project will not require the amount of excavation that would exceed the City's thresholds for requiring paleontological monitoring. Therefore, impacts would be less than significant, and no mitigation measures are required.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

This project will not disturb any human remains. Please see V(a), impacts to historical resources including human remains, are not anticipated, and mitigation is not required. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VI. GEOLOGY AND SOILS – Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

☐ ☐ ☒ ☐

A geotechnical evaluation by Ninyo & Moore, dated September 6, 2018, has been conducted for this project. The project will utilize proper engineering design and standard construction practices in order to ensure that potential impacts in this category based on regional geologic hazards would remain less than significant. Therefore, risks from rupture of a known earthquake fault would be below a level of significance.

- ii) Strong seismic ground shaking? ☐ ☐ ☒ ☐

See VI(a)i above. The project would also be required to utilize proper engineering design and standard construction practices to ensure the potential for impacts from ground shaking would be below a level of significance.

- iii) Seismic-related ground failure, including liquefaction? ☐ ☐ ☒ ☐

See VI(a)i See VI(a)i. above. Liquefaction occurs when loose, unconsolidated, water-laden soils are subject to shaking, causing the soils to lose cohesion. Implementation of the project would not result in an increase in the potential for seismic-related ground failure, including liquefaction. Impacts would be less than significant.

- iv) Landslides? ☐ ☐ ☒ ☐

See VI(a)i above. Implementation of the project would not expose people or structure to potential adverse effects, including the risk of loss, injury, or death involving landslide. Impacts would be less than significant.

- b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

See VI(a)i above. Construction of the project would temporarily disturb onsite soils during grading activities, thereby increasing the potential for soil erosion to occur; however, the use of standard erosion control measures during construction would reduce potential impacts to a less than a significant level. As such, the project would not result in a substantial amount of soil erosion or loss of topsoil. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

See VI(a)i above. In addition, proper engineering design and utilization of standard construction practices would ensure the potential impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See VI(a)i above.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Not applicable, as the project does not propose septic or alternative wastewater systems. Therefore, no impact would occur.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The construction of the project is consistent with the land use and would not be expected to have a significant impact related to greenhouse gases.

In December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. The purpose of the Climate Action Plan Consistency Checklist (Checklist) is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

This Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

Per the Climate Action Plan (CAP) Consistency Checklist for the Fire-Rescue Air Operations Phase II Project (2020), the proposed project will have a less than significant impact on the environment, either directly or indirectly, because the proposed project is consistent with the Climate Action Plan. The project is consistent with the existing land use plan. The proposed hangar roofing will include solar reflection/thermal emittance materials in accordance with the measures of the California Green Building Standards Code. All plumbing fixtures will not exceed maximum flow rates specified in the California Green Building Standards Code and meet said provisions. The project will provide a minimum of two bicycle parking spaces, consistent with this CAP strategy. The project is not adding employee capacity and is designed to accommodate an Air Operations crew of 9 members. Therefore, the project is providing fewer than 10 new parking spaces and not required to provide electrical vehicle charging stations or carpool/vanpool vehicles. In addition, the project is not subject to the Transportation Demand Management Program because the project is accommodating fewer than 50 employees.

With the incorporation of the preceding project design features, impacts from greenhouse gas emissions are considered less than significant, and no mitigation measures are required.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project as proposed would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions in that it would be constructed in an established urban area with services and facilities available. In addition, the project is consistent with the underlying land use designation.

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project proposes to construct a helicopter hangar and apron attached to the existing Fire-Rescue air operations building and existing apron and parking pad. The project includes two above-ground fuel storage tanks, each with 12,000 gallon capacity (24,000 gallons total).

The project site was listed in the databases for hazardous materials including being listed in the State Water Resources Control Board Geo Tracker system, which includes leaking underground fuel

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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tank sites (seven within the airport property) inclusive of spills, leaks, investigations, and cleanup program. The premises contained no sites listed on the Department of Toxic Substances Control EnviroStor Data Management System, which includes CORTESE sites.

Construction activities for the project would involve the use of potentially hazardous materials including vehicle fuels, oils, transmission fluids, paint adhesives, surface coatings and other finishing materials, and cleaning solvents. However, the use of these hazardous materials would be temporary, and all potentially hazardous materials would be stored, used, and disposed of in accordance with manufacturers' specifications, applicable federal, state, and local health and safety regulations. As such, impacts associated with the transport, use, or disposal of hazardous materials would be less than significant during construction.

With regards to operation, the new fire station would include an aboveground fuel storage tank and gas pump, oxygen tanks, and drums of engine oil. All potentially hazardous materials would be handled, used, and stored in accordance with manufacturers' specifications and applicable federal, state, and local health and safety regulations. With adherence to these measures no impacts should result at the operation phase.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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Refer to response VIII (a) above.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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There are no existing or proposed schools located within a quarter mile of the project site.

- d) 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, would it create a significant hazard to the public or the environment?

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Refer to response VIII (a) above.

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

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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction of the project would occur within Montgomery-Gibbs Executive Airport, which falls within the Montgomery Field Master Plan, and the Airport Land Use Compatibility Plan (ALUCP).

Activities associated with the construction would not increase the potential to result in a safety hazard for people residing or working in areas surrounding the project site. Long-term operation of the fire-rescue air operations facility would not interfere with the operations of any airport.

Construction would not require temporary closure of the airport nor would it result in diversion of aircraft during construction. Construction activities have the potential to interfere with aircraft operating at Montgomery Gibbs Executive Airport through the creation of dust or smoke, which may impair a pilot's vision or views of the airfield, or otherwise obstruct airspace. Standard dust control BMPs (e.g. water spray down) would be utilized to the greatest extent feasible to limit the generation of dust on the project site. In addition to obstruction of navigable airspace, we are required by the FAA to submit permit 7460-1 (FAA determination of heights) for all equipment over 15' high and cannot penetrate the 'imaginary' surfaces described. This is done prior to start of construction. All equipment is also required to have a White and Orange checkered flag or an amber light.

To avoid safety issues associated with construction activity on an active airfield, the construction contractor will coordinate with airport management to inform them of planned construction activities. Updates will be provided to airport staff on a weekly or bi-weekly basis or as needed based on construction phasing. In addition, all construction staff must attend and pass Airport Driver Training, which trains personnel on how to operate and maneuver on an active airfield. This is to ensure all safety measures are being met, and to coordinate work that may require impacts to operations. As such, safety hazards to people residing or working in the project area would be less than significant.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project site is not in proximity to any private airstrip. No impacts would result.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Construction activities associated with the proposed project will take place within the Montgomery Airfield boundary. Although trucks and construction vehicles will deliver materials to and transport debris from the project site, all other construction activity would remain localized within the airport property boundary. Due to limitation of construction activities to the Montgomery Airfield and the temporary use of local roadways for movement of construction vehicles and equipment, potential impacts associated with the impairment of or interference with an adopted emergency response or evacuation plan would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| h) Expose people or structures to a significant risk of loss, injury or death | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

The project is located within the Montgomery-Gibbs Executive Airport and outside of the Very High Fire Severity Zone. The project proposes to construct a hangar and a concrete pad and does not require brush management. Therefore, the project would not expose people or structures to wildland fires. No impacts would occur.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would comply with all storm water quality standards during and after construction, and appropriate Best Management Practices (BMP's) will be utilized and provided for on-site. Implementation of these BMP's would preclude any violations of existing standards and discharge regulations. This will be addressed through the project's Conditions of Approval; therefore, impacts would be less than significant, and no mitigation measures are required.

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| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project does not require the construction of wells. The project is located within the Montgomery-Gibbs Executive Airport with existing public water supply infrastructure. The proposed project would generate an incremental increase in water demand. As such, operation of the proposed project would not substantially deplete groundwater supplies. As such, any impacts would be less than significant, and no mitigation measures are required.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not substantially alter the existing drainage pattern of the site or the area. Streams or rivers do not occur on or adjacent to the site. Although grading is proposed, the project would implement on-site BMPs, therefore ensuring that substantial erosion or siltation on-or off-site would not occur. Impacts would be less than significant, and no mitigation measures are required.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Substantially alter the existing drainage pattern of the site or area, including | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?				

The project would implement low impact development principles ensuring that a substantial increase in the rate or amount of surface runoff resulting in flooding on or off-site, or a substantial alteration to the existing drainage pattern would not occur. Streams or rivers do not occur on or adjacent to the project site. Impacts would be less than significant, and no mitigation measures are required.

e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project would comply with all City storm water quality standards during and after construction. Appropriate BMP's would be implemented to ensure that water quality is not degraded; therefore, ensuring that the project runoff is directed to appropriate onsite drainage caption systems. Per the Storm Water Quality Management Plan (SWQMP) for this project, "A trench drain located on the north and west side of the building is being placed to convey the flows from the impervious areas into a modular wetland system for water quality purposed before entering the underground vault storage unit. As for the flows from the pervious areas located on the north side they will be capture by an earthen swale located on the west side on the existing access road and running in a southwesterly direction where they will capture by a catch basin that will convey them into the underground storage vault. There will be no adverse effect to the public storm drain." (Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Fire Station 50, 2016) As such, any impacts would be less than significant with incorporation of "Project Design" features addressing drainage. As such, no mitigation measures are required.

f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project would comply with all City storm water quality standards during and after construction. Appropriate BMP's would be implemented to ensure that water quality is not degraded. Impacts would be less than significant, and no mitigation measures are required.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not located within a 100-year flood hazard area or any other known flood area. No impacts would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

See Response (IX)(g). No impacts would result.

X. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would involve the construction of new hangar space and a concrete apron to accommodate five helicopters, which is consistent with the General Plan, Kearny Mesa Community Plan, the Montgomery-Gibbs Executive Airport Master Plan and Montgomery Field Airport Land Use Compatibility Plan (ALUCP). The project site is located on the Montgomery-Gibbs Executive Airport which is surrounded by a combination of existing commercial, residential, and industrial/business parks. The project would not substantially change the nature of the surrounding area and would not introduce any barriers or project features that could physically divide the community. Thus, no impact will occur.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See response X(a) above. The project is compatible with the General Plan, Kearny Mesa Community Plan, Montgomery-Gibbs Executive Airport Master Plan, and the Airport Land Use Compatibility Plan (ALUCP). Construction of the project would occur within Montgomery-Gibbs Executive Airport. A Site Development Permit (SDP) is required by the Land Development Code for impacts to Environmentally Sensitive Lands (ESL). The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, community plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. No conflict would occur and thus, no impacts would result.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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As previously identified, the project site lies within the boundaries of the City San Diego Multiple Species Conservation Plan (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP). The City's Multi-Habitat Planning Area (MHPA) is mapped onsite; more specifically, the project site lies partially within the MHPA of the City's MSCP along the eastern boundary. MHPA Lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region.

Due to the presence of the MHPA, “edge effects” could result because of the potential introduction of drainage, toxics, lighting, noise, invasives, grading, barriers and brush management that can indirectly affect adjacent habitat and wildlife species. Indirect impacts to the MHPA would be avoided through implementation of the MHPA Land Use Adjacency Guidelines (LUAG) as outlined in the City’s MSCP Subarea Plan (Section 1.4.3) and implementation of the VPHCP Avoidance and Minimization Measures (Section 5.2.1).

Further, the project site is also located on an airport and adjacent to development. Although the project site contains ESL (MSCP/VPHCP lands) the project as designed would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Impacts to any applicable habitat conservation plan or natural community conservation plan would not result. Refer to Land Use Section IV(f) for further details.

XI. MINERAL RESOURCES – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The areas around the proposed project alignment are not being used for the recovery of mineral resources and are not designed by the General Plan or other local, state or federal land use plan for mineral resources recovery; therefore, the project would not result in the loss of mineral resources and no impact would result.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to XI(a), above. The project site has not been delineated on a local general, specific or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. Therefore, no impacts were identified.

XII. NOISE – Would the project result in:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Any short-term noise impacts related to construction activities would be required to comply with the construction hours specified in the City’s Municipal Code (Section 59.5.0404, Construction Noise), which are intended to reduce potential adverse effects resulting from construction noise.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The City evaluates the potential aircraft noise impacts on noise sensitive land uses when considering the siting or expansion of airports, heliports, and helistops/helipads as addressed in the Land Use Element of the General Plan. Aircraft noise is one of the factors that the state-required Airport Land Use Compatibility Plans address with established policies for land use compatibility for each public use airport. The City implements the noise policies contained in the compatibility plans through development regulations and zoning ordinances in the Land Development Code.</p> <p>The proposed project is consistent with the Montgomery Field Airport Land Use Compatibility Plan (ALUCP). The ALUCP includes limitations within the airport influence area related to height, density, and noise and the San Diego Municipal Code implements the ALUCP with supplemental regulations contained within the Airport Land Use Compatibility Overlay Zone.</p> <p>Additionally, noise-compatible commercial and industrial uses are adjacent to the airport. To minimize the impact on surrounding residential areas, Montgomery Field has a noise-monitoring program to assess aircraft noise and regulations, including a nighttime noise limits and a weight limit for aircraft using the airport.</p> <p>Therefore, the project would not generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies as the project is consistent with the adopted ALUCP and any impacts would be less than significant and no mitigation measures are required.</p>				
b) Generation of, excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>See response XII (a) above. Potential short-term effects from construction noise would be reduced through compliance with City restrictions. No significant long-term impacts would occur, and no mitigation measures are required.</p>				
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>See response XII (a) above. The proposed project is an expansion of an existing Fire-Rescue air operations facility which will serve the existing employees. No significant impacts would occur, and no mitigation measures are required.</p>				
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The proposed project is an expansion of an existing Fire-Rescue air operations facility which will serve the existing employees. In addition, the proposed project is consistent with the Montgomery Field Airport Land Use Compatibility Plan (ALUCP) and the San Diego Municipal Code implements the ALUCP with supplemental regulations contained within the Airport Land Use Compatibility Overlay Zone. Potential short-term effects from construction noise would be reduced through</p>				

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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compliance with City restrictions. The long-term operation impacts would not substantially (temporary or periodic) increase the ambient noise levels in the project vicinity above existing and therefore, no significant impacts would occur, and no mitigation measures are required.

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

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See response XII (a) above. The project would not expose people residing or working in the area to excessive noise levels and the project is consistent with the adopted ALUCP. Additionally, noise-compatible commercial and industrial uses are adjacent to the airport. To minimize the impact on surrounding residential areas, Montgomery Field has a noise-monitoring program to assess aircraft noise and regulations, including nighttime noise limits and a weight limit for aircraft using the airport. Any impacts would be less than significant, and no mitigation measures are required.

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

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The proposed project is not located within the vicinity of a private airstrip. No impacts would result.

XIII. POPULATION AND HOUSING – Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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The project scope does not include the construction of new or extended roads or infrastructure, or new homes and businesses. The project would create new hangar space and a concrete apron to accommodate five helicopters at an existing Fire-Rescue air operations facility. As such, the project would not increase housing or population growth in the area. No impacts would result.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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No such displacement would result. There is no existing housing within the boundaries of the proposed project. The project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. No impacts would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Refer to XIII(b) above. No impacts would result.

XIV. PUBLIC SERVICES

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

- i) Fire protection ☐ ☐ ☐ ☒

The project would create new hangar space and a concrete apron to accommodate five helicopters at an existing Fire-Rescue air operations facility. The project would not result in adverse impacts to or need for additional fire facilities or adversely affect existing levels of fire services. no mitigation measures are required.

- ii) Police protection ☐ ☐ ☐ ☒

The project would not affect existing levels of police protection service and would not require the construction or expansion of a police facility. No impacts would occur.

- iii) Schools ☐ ☐ ☐ ☒

The project would not affect existing levels of public services and would not require the construction or expansion of a school facility. As such, no impacts related to school services occur.

- iv) Parks ☐ ☐ ☐ ☒

The project would not affect existing levels of public services and would not require the construction or expansion of a park facility. No impacts would occur.

- v) Other public facilities ☐ ☐ ☐ ☒

The project would not affect existing levels of public services; therefore, no new or altered government facilities would be required. No impacts would occur.

XV. RECREATION

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

- ☐ ☐ ☐ ☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would not adversely affect the availability of and/or need for new or expanded recreational resources. The project would not adversely affect existing levels of public services and would not require the construction or expansion of an existing governmental facility. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities. Therefore, the project is not anticipated to result in the use of available parks or facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, no impacts would occur.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to XV (a) above. The project does not propose recreation facilities nor require the construction or expansion of any such facilities. No impacts would occur.

XVI. TRANSPORTATION/TRAFFIC – Would the project?

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is consistent with the General Plan and Kearny Mesa Community Plan land use and the Montgomery Field Airport Land Use Compatibility Plan. The project would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

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, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts.

In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including new section 15064.3. Under the new section, vehicle miles traveled (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 Draft City of San Diego Transportation Study Manual (TSM) dated June 10, 2020 is consistent with the California Environmental Quality Act (CEQA) guidelines and utilizes VMT as a metric for

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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evaluating transportation-related impacts. Based on these guidelines, all projects shall go through a screening process to determine the level of transportation analysis that is required.

The project would create new hangar space and a concrete apron to accommodate five helicopters at an existing Fire-Rescue air operations facility and classifies as Locally Serving Public Facility. A Locally Serving Public Facility is 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.

Based upon the screening criteria identified above, the Proposed Project qualifies as a “Locally Serving Public Facility” and is screened out from further VMT analysis. Therefore, as recommended in the Draft City of San Diego Draft TSM, June 10, 2020, the proposed project would not result in impacts. presumed to have a less than significant VMT impact.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not create a permanent increase in hazards resulting from design features. The project does not propose any change in land use that would affect existing land uses in the area. Montgomery Field Airport would continue to meet applicable standards set forth by the City of San Diego and the Federal Aviation Administration. No impacts related to hazardous design features will occur as a result of the proposed project.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project would be contained entirely within the boundaries of Montgomery-Gibbs Executive Airport. The hangar space and a concrete apron to accommodate five helicopters would not interfere with emergency access to the airport or critical areas (e.g. runways) on the airfield itself. Following completion of the project, access capability to the airfield would be the same as pre-project conditions. There would be no impact.

XVII. TRIBAL CULTURAL RESOURCES – Would the project cause 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 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego notified the Lipay Nation of Santa Isabel, [Jamul Indian Village](#) and the San Pasqual Band of Mission Indians traditionally and culturally affiliated with the project area. During the 30-day notification period, it was identified that there could be potential impacts to Tribal Cultural Resources during ground-disturbing activities; so, archaeological monitoring (with a Native American present) during ground-disturbing activities was identified. Therefore, with implementation of the tribal cultural resources monitoring program, potential impacts on Tribal Cultural Resources would be reduced to less than significant.

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|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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 Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Refer to XVII (a) above.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the project would not interrupt existing sewer service to the project site or other surrounding uses. A minor increase in demand for wastewater disposal or treatment would be created by the project, as compared to current conditions. The proposed Fire-Rescue air operations facility is not anticipated to generate significant amounts of wastewater. Wastewater facilities used by the project would be operated in accordance with the applicable wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). Additionally, the project site is located in an urbanized and developed area. Adequate services are already available to serve the project. Impacts would be less than significant, and no mitigation measures are required.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See response XVIII (a) above. Adequate services are available to serve the project site. Additionally, the proposed project would not significantly increase the demand for water or wastewater treatment services and thus, would not trigger the need for new treatment facilities. Impacts would be less than significant, and no mitigation measures are required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Yes, the project will require construction of new storm water drain facilities. Storm water from the new redevelopment will be collected in an underground storm drain system to prevent storm water from draining into the existing vernal pools. It will then be routed for treatment to a Permanent BMP and to a detention/retention facility to comply with the City and State storm water regulations. Therefore, impacts would be less than significant, and no mitigation measures are required.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project does not meet the CEQA significance threshold requiring the need for the project to prepare a water supply assessment. The existing project site currently receives water service from the City, and adequate services are available to serve the proposed Fire-Rescue air operations facility without requiring new or expanded entitlements. No impact would occur.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Construction of the project would not adversely affect existing wastewater treatment services. The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No impact would occur.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Construction debris and waste would be generated from the construction of the project. All construction waste from the project site would be transported to an appropriate facility, which would have sufficient permitted capacity to accept that generated by the project. Furthermore, the project would be required to comply with the City's Municipal Code requirement for diversion of both construction waste during the short-term, construction phase and solid waste during the long-term, operational phase. Impacts are considered to be less than significant, and no mitigation measures are required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Comply with federal, state, and local statutes and regulation related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project would comply with all Federal, State, and local statutes and regulations related to the handling and disposal of solid waste. The project would not result in the generation of large amounts of solid waste, nor generate or require the transport of hazardous waste materials, other than minimal amounts generated during the construction phase. All construction waste would comply with any City of San Diego requirements for diversion, as well as solid waste during the long-term, operational phase. Impacts would be less than significant, and no mitigation measures are required.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE –

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Biological Resources. As such, mitigation measures and conditions of approval have been incorporated into the project to reduce impacts to less than significant as outlined within the Mitigated Negative Declaration.

Impacts associated with Tribal Cultural Resources are individually significant and when taken into consideration with other past projects in the vicinity, may contribute to a cumulative impact; specifically, with respect to non-renewable resources. However, with implementation of the MMRP, any information associated with these resources would be collected catalogued and included in technical reports available to researchers for use on future projects, thereby reducing the cumulative impact to below a level of significance.

b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As documented in this Initial Study, the project may have the potential to degrade the environment, as a result of impacts to biological resources (vernal pools). The direct and unavoidable impacts to

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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vernal pools would be considered significant. The City of San Diego MSCP Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP) addresses cumulative impacts on biological resources throughout San Diego. Since the mitigation measures and conditions of project approval identified in Section V of the MND are consistent with the avoidance and mitigation requirements for listed species (specifically vernal pools), and the mitigation ratio requirements, of the Subarea Plan and VPHCP, the proposed project is consistent with the Subarea Plan and VPHCP. As a result, project implementation would not result in any individually limited, but cumulatively significant impacts to these resources. Other future projects would be required to comply with applicable local, state, and federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts.

Impacts associated with Tribal Cultural Resources are individually significant and when taken into consideration with other past projects in the vicinity, may contribute to a cumulative impact; specifically, with respect to non-renewable resources. However, with implementation of the MMRP, any information associated with these resources would be collected catalogued and included in technical reports available to researchers for use on future projects, thereby reducing the cumulative impact to below a level of significance.

- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

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The construction of a new helicopter hanger to serve the Fire-Rescue air operations facility is consistent with the institutional land use anticipated by the City (Kearny Mesa Community Plan), the Montgomery Field Airport Land Use Compatibility Plan and implementing regulations as part of the Municipal Code. The City of San Diego conducted an Initial Study which determined that the project could have a significant environmental effect in the following area Biological Resources and Tribal Cultural Resources. Based on the analysis presented above, implementation of the aforementioned mitigation measures would reduce environmental impacts such that no substantial adverse effects on humans would occur.

INITIAL STUDY CHECKLIST REFERENCES

I. Aesthetics / Neighborhood Character

- ☐ City of San Diego General Plan
☒ Community Plans: Kearny Mesa Community Plan

II. Agricultural Resources & Forest Resources

- ☐ City of San Diego General Plan
☐ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
☐ Site Specific Report:

III. Air Quality

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- ☒ Regional Air Quality Strategies (RAQS) - APCD
- ☐ Site Specific Report:

IV. Biology

- ☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- ☐ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- ☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- ☒ City of San Diego, Vernal Pool Habitat Conservation Plan (VPHCP), 2017
- ☒ Community Plan - Resource Element
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001
- ☒ City of San Diego Land Development Code Biology Guidelines
- ☒ Site Specific Reports:
 - Biological Technical Report for the Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II, San Diego California, prepared by City of San Diego – Public Works Department, May 20, 2020
 - Vernal Pool Mitigation Plan for the La Media Road Widening & Fire-Rescue Air Operations Phase II Project, San Diego California, prepared by RECON Environmental Inc, May 28, 2020
 - Jurisdictional Waters-Wetland Delineation for the San Diego Fire-Rescue Air Operations Hangar Project San Diego, California

V. Cultural Resources (includes Historical Resources and Built Environment)

- ☐ City of San Diego Historical Resources Guidelines
- ☐ City of San Diego Archaeology Library
- ☐ Historical Resources Board List
- ☐ Community Historical Survey:
- ☒ Site Specific Report: Historical Resources Survey for the San Diego Fire-Rescue Air Operations Hangar Project

VI. Geology/Soils

- ☐ City of San Diego Seismic Safety Study
- ☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- ☒ Site Specific Report: Preliminary Geotechnical Evaluation; San Diego Fire-Rescue Air Operations Hangars; Montgomery-Gibbs Executive Airport; San Diego, California; Ninyo & Moore, September 6, 2018.

VII. Greenhouse Gas Emissions

- ☒ Site Specific Report: Climate Action Plan (CAP) Consistency Checklist for the Fire-Rescue Air Operations Phase II Project (2020)

VIII. Hazards and Hazardous Materials

- ☒ San Diego County Hazardous Materials Environmental Assessment Listing
- ☐ San Diego County Hazardous Materials Management Division
- ☐ FAA Determination (see Land Use)
- ☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- ☒ Airport Land Use Compatibility Plan: Montgomery Field Airport Land Use Compatibility Plan
- ☐ Site Specific Report:

IX. Hydrology/Drainage

- ☐ Flood Insurance Rate Map (FIRM)
- ☐ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- ☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- ☒ Site Specific Report: Drainage Report for Montgomery Air Fire Rescue Facility

X. Land Use and Planning

- ☒ City of San Diego General Plan
- ☒ Community Plan: Kearny Mesa Community Plan
- ☒ Airport Land Use Compatibility Plan: Montgomery Field Airport Land Use Compatibility Plan
- ☐ City of San Diego Zoning Maps
- ☐ FAA Determination: Federal Aviation Administration (Approval of Heights)
- ☐ Other Plans:

XI. Mineral Resources

- ☐ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- ☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- ☐ City of San Diego General Plan: Conservation Element
- ☐ Site Specific Report:

XII. Noise

- ☒ City of San Diego General Plan
- ☐ Community Plan
- ☐ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☒ Montgomery Field CNEL Maps
- ☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☐ Site Specific Report:

XIII. Paleontological Resources

- ☒ City of San Diego Paleontological Guidelines
- ☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996

- ☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- ☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- ☐ Site Specific Report:

XIV. Population / Housing

- ☐ City of San Diego General Plan
- ☐ Community Plan
- ☐ Series 11/Series 12 Population Forecasts, SANDAG
- ☐ Other:

XV. Public Services

- ☐ City of San Diego General Plan
- ☐ Community Plan

XVI. Recreational Resources

- ☐ City of San Diego General Plan
- ☐ Community Plan
- ☐ Department of Park and Recreation
- ☐ City of San Diego - San Diego Regional Bicycling Map
- ☐ Additional Resources:

XVII. Transportation / Circulation

- ☐ City of San Diego General Plan
- ☐ Community Plan:
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☐ San Diego Region Weekday Traffic Volumes, SANDAG
- ☐ Site Specific Report:

XVIII. Utilities

- ☐ Site Specific Report:

XIX. Water Conservation

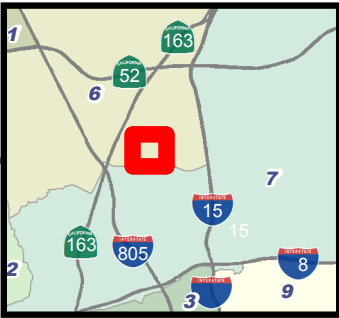
- ☐ Sunset Magazine, *New Western Garden Book*, Rev. ed. Menlo Park, CA: Sunset Magazine

XX. Water Quality

- ☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- ☒ Site Specific Report: Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) San Diego Fire Rescue Air Facility

Revised: August 2018

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The City of
SAN DIEGO Public Works
**FIRE RESCUE AIR OPERATIONS
FACILITIES PHASE II**

SENIOR ENGINEER
Jason Grani
(619) 533-7525

PROJECT MANAGER
James Botica
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PROJECT ENGINEER
Sophia Dowell
(619) 533-5228

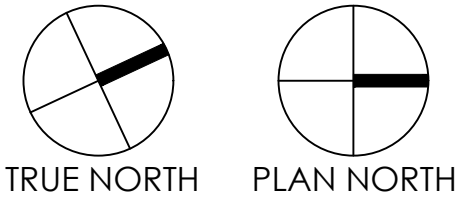
FOR QUESTIONS ABOUT THIS PROJECT
Call: (619) 533-4207
Email: engineering@sandiego.gov



Legend

 Fire Rescue Air Operations Facility Phase II





SAN DIEGO FIRE RESCUE AIR OPERATIONS PHASE I - BRIDGING DOCUMENTS

WBS _____

SUBMITTED BY:
JAMES BOTICA
PROJECT MANAGER

CHECKED BY: _____

PROJECT ENGINEER

CCS27 COORDINATE

CCS83 COORDINATE

XXXXXX - - D

APPROVED: _____
FOR CITY ENGINEER _____ DATE _____

PRINT NAME		RCE#		
DESCRIPTION	BY	APPROVED	DATE	FILMED

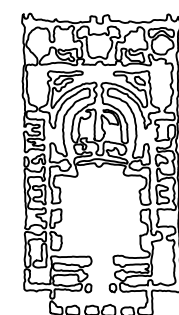
				*

DATE STARTED _____

DATE COMPLETED _____

CONTRACTOR _____	DATE STARTED _____
INSPECTOR _____	DATE COMPLETED _____

SPEC. NO.



The City of
SAN DIEGO  Public Works

WARNING



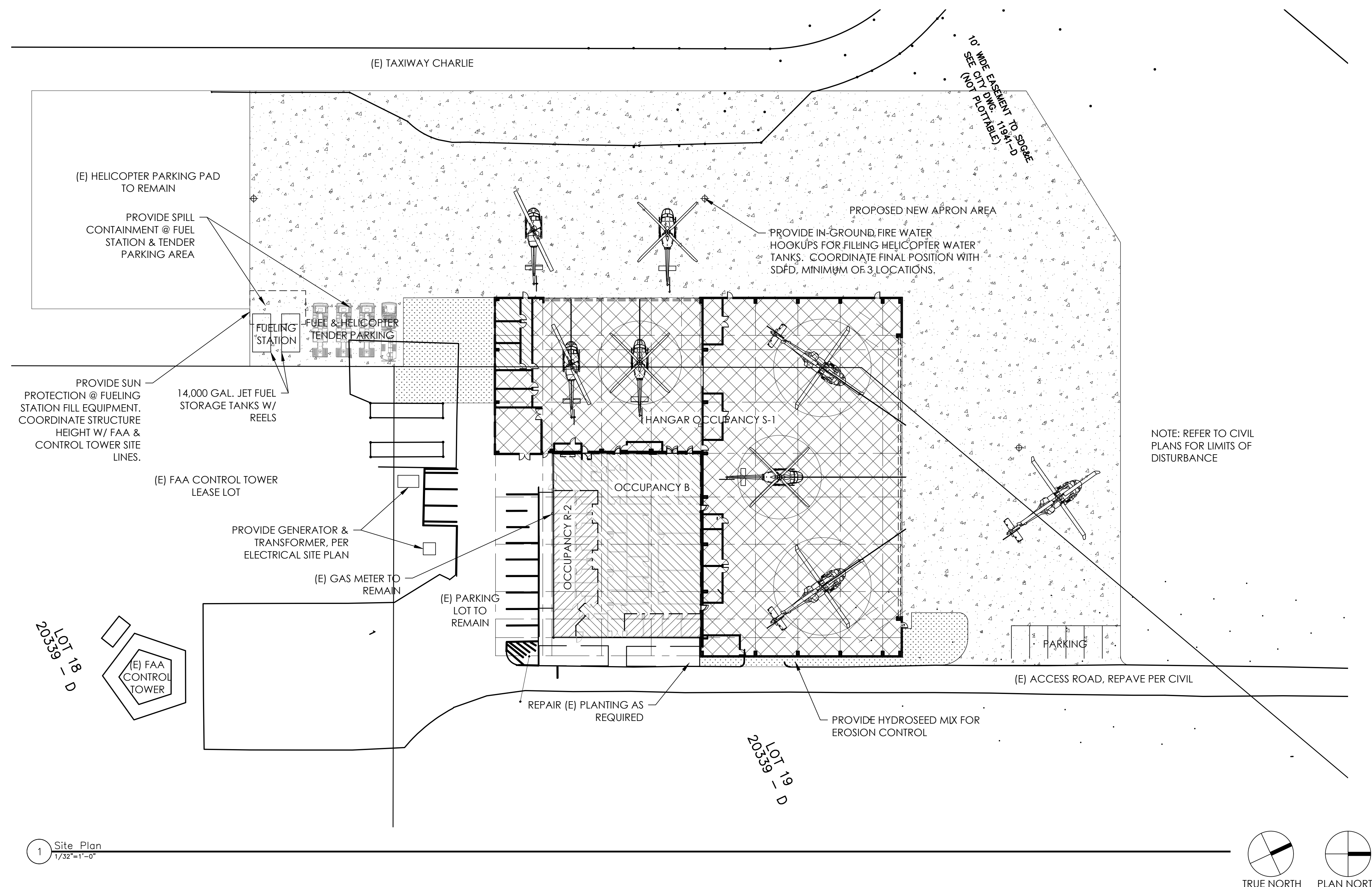
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NOT MEASURE 1"
THEN DRAWING IS
NOT TO SCALE.

CONSTRUCTION CHANGE / ADDENDUM

CHANGE	DATE	AFFECTED OR ADDED SHEET NUMBERS	APPROVAL NO.
-	-	-	

GENERAL NOTES

1. REFER TO CIVIL AND ELECTRICAL PLANS FOR ADDITIONAL UTILITY INFORMATION NOT SHOWN.
2. LOCATIONS OF HELICOPTERS ON APRON ARE FOR DIAGRAMMATIC PURPOSES, ONLY, AND DO NOT NECESSARILY REPRESENT FINAL INTENDED PARKING LOCATIONS.



A-002

SAN DIEGO FIRE RESCUE
AIR OPERATIONS - PHASE II (PTS 625280)
AIR OPERATIONS SITE PLAN

CONSTRUCTION CHANGE / ADDENDUM			
CHANGE	DATE	AFFECTED OR ADDED SHEET NUMBERS	APPROVAL NO.
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WARNING
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IF THIS BAR DOES NOT MEASURE 1" THEN DRAWING IS NOT TO SCALE.



CONSULTANT		SPEC. NO.	CITY OF SAN DIEGO, CALIFORNIA PUBLIC WORKS DEPARTMENT out of		WBS			
	PLATT/WHITELAW ARCHITECTS, INC.		APPROVED:		SUBMITTED BY: JAMES BOTICA PROJECT MANAGER			
			FOR CITY ENGINEER	DATE	CHECKED BY: - PROJECT ENGINEER			
			PRINT NAME	RCE#	CCS27 COORDINATE			
			DESCRIPTION	BY	APPROVED	DATE	FILMED	CCS83 COORDINATE
								XXXXX - - D
			DATE STARTED		DATE COMPLETED			
			CONTRACTOR		INSPECTOR			