DRAFT ENVIRONMENTAL ASSESSMENT

SAN DIEGO FIRE-RESCUE
AIR OPERATIONS HANGAR PROJECT

MONTGOMERY-GIBBS EXECUTIVE AIRPORT
SAN DIEGO, CALIFORNIA

Prepared for:

CITY OF SAN DIEGO

and

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
As Lead Federal Agency pursuant to the National Environmental Policy Act of 1969

Prepared by:

RECON Environmental, Inc.

December 2020

This Environmental Assessment becomes a federal document when evaluated, signed and dated by the responsible FAA Official.

Responsible FAA Official	**Date**

This page intentionally left blank

GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT'S IN THIS DOCUMENT? This document contains the Draft Environmental Assessment (EA) for the proposed Fire-Rescue Air Operations (AirOps) Hangar Project (Proposed Action) at Montgomery-Gibbs Executive Airport. The Proposed Action analyzed in this environmental documentation include: construction of approximately 32,000 square feet of prefabricated metal hangar buildings, an approximately 65,000-square-foot concrete apron, and parking and shelter for a single helitender and two fueling tender vehicles. The Proposed Action would also design and relocate existing utility connections (sewer, storm water, gas, water, power, etc.) within the main access roadway from Ponderosa Avenue and construct new storm water retention features. This document discloses the analysis and findings of the potential impacts of the Proposed Action, No Action and other reasonable alternatives in fulfillment of Federal Aviation Administration (FAA) policies and procedures relative to the National Environmental Policy Act and other related federal requirements.

BACKGROUND. The purpose of the Proposed Action is to provide at least 30,000 square feet of hangar space to meet the future needs of the AirOps fleet, which currently operates without any hangar space at Montgomery-Gibbs Executive Airport. The Draft EA was released for public and agency review and comment on TBD. The Notice of Availability of the Draft EA was published in The *Daily Transcript* newspaper and the City of San Diego's website to inform the general public and other interested parties.

WHAT SHOULD YOU DO? Read this Draft EA on this Proposed Action and provide comments, if applicable. Copies of the document are available for review online at [City to Provide]. If you have important information you believe has not been considered in this document or comments about the conclusions you may submit your written comments by letter to the following address:

City of San Diego
Engineering and Capital Projects Department
ATTN: Sean Paver
525 B Street, Suite 750, MS908A
San Diego, CA 92101

The cutoff date for comment submission is TBD, not later than 5:00 PM – Pacific Standard Time. Please allow enough time for mailing. City of San Diego must receive your comments by the deadline, not simply postmarked, by that date.

WHAT HAPPENS AFTER THIS? The FAA and the City of San Diego will revise the Draft EA, as necessary, in response to comments received on the Draft EA, and prepare the Final EA. Following review of the Final EA, the FAA will either issue a Finding of No Significant Impact or decide to prepare an Environmental Impact Statement.

Before including your name, address and telephone number, email, or other personal identifying information in your comment, be advised that your entire comment–including your personal identifying information–may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

This page intentionally left blank

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

This page intentionally left blank

1.0 PURPOSE AND NEED

1.1 Introduction

The City of San Diego (City) proposes to construct Phase II of the Fire-Rescue Air Operations (AirOps) Hangar Project (Proposed Action) at Montgomery-Gibbs Executive Airport (MYF), located in the city of San Diego, California. The Proposed Action would support Phase I of the AirOps Facility Project that was completed in November 2019. Phase I consisted of interior remodeling and tenant improvements of the existing AirOps building. Phase II would add helicopter hangars and support facilities to make the AirOps building improved under Phase I a fully operational fleet center for the Fire Department's helicopters and rapid fire response. The City, which owns and operates MYF, seeks the Federal Aviation Administration's (FAA) unconditional approval of the portion of the Airport Layout Plan (ALP) that depicts the Proposed Action pursuant to 49 United States Code (U.S.C.) § 40103(b), 44718, and 47107(a)(16), and Title 14 Code of Federal Regulations (CFR) Part 77 and Part 157. The Proposed Action includes construction of permanent helicopter hangars and support facilities at MYF. A detailed description of the Proposed Action is provided in Section 1.4.

This Environmental Assessment (EA) has been prepared pursuant to the requirements of the National Environmental Policy Act (NEPA) as amended (42 U.S.C. § 4321, *et seq.*); the Council on Environmental Quality Regulations (CEQ) Regulations for Implementing the Procedural Provisions of the NEPA (40 CFR §§ 1500-1508); and the Airport and Airway Improvement Act of 1982, as amended (Public Law 97-248). This EA has also been prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, and other federal, state, and local requirements, and other federal, state, and local requirements. This EA is intended to identify and consider potential environmental impacts related to the Proposed Action. The FAA is the lead federal agency and is responsible for ensuring compliance with NEPA. Public notices and agency correspondence associated with the Proposed Action and this EA are presented in Appendix A.

1.2 Background

MYF is located within the Kearny Mesa Community Planning Area of the city of San Diego, California and is bounded by State Route 163 to the west, Balboa Avenue to the North, Aero Drive to the South, and a mix of commercial and office development to the east. MYF (initially known as Gibbs Field) was established in 1937 by William Gibbs and was used to train U.S. Army Air Corps cadets. MYF began to operate as public-use airport when the City purchased Gibbs Field in 1947.

MYF has two parallel runways (10L-28R and 10R-28L) oriented in a northwest/southeast alignment, and a crosswind runway (5-23) oriented in a northeast/southwest alignment. MYF also has one helipad. General aviation aircraft that operate at MYF include private, corporate, charter, air ambulance, law enforcement, fire rescue, flight training and cargo. MYF does not cater to air carrier or military aviation requirements.

1.3 Proposed Action

The Proposed Action includes construction of permanent helicopter hangars and support facilities at MYF. The Proposed Action is located in the northeastern corner of the airport. Regional and Airport Boundary maps are provided in Figures 1 and 2, respectively. The study area consists of a 6.5-acre site located adjacent to the Air Traffic Control Tower between the FAA lease area, the Runway Object Free Area (ROFA), and the Runway Protection Zone (RPZ) for the northwest approach to Runway 5/23 (Figure 3). The Proposed Action is located east of the Taxiway Charlie and the Taxiway Safety Area. Entry to the Proposed Action site is via an asphalt road accessed from a security gate located off Ponderosa Avenue. The majority of the Proposed Action site consists of undeveloped vegetated land that is regularly mowed as part of airport maintenance activities.

The Proposed Action would construct approximately 32,000 square feet of prefabricated metal hangar buildings, as well as an approximately 65,000-square-foot concrete apron, to accommodate five helicopters. The new hangar space would include a hangar support area for maintenance offices, over-haul, avionics, and storage rooms. The Proposed Action would also construct parking and shelter for a single helitender and two fueling tender vehicles. Additionally, the Proposed Action would design and relocate existing utility connections (sewer, storm water, gas, water, power, etc.) within the main access roadway from Ponderosa Avenue. Once project construction and utility relocation are completed, the main access roadway would be repaired and resurfaced from Ponderosa Avenue to the FAA Air Traffic Control Tower and the new AirOps facility.

The Proposed Action would also introduce storm water retention features that would capture runoff from the proposed improvements and a parking pad that would be constructed as a separate project adjacent to the southern project boundary. The Proposed Action would route all runoff from new impervious areas into a modular wetland for water quality and then into an underground storage system for detention of the 100-year peak volumes. Captured peak runoff volumes from the six-hour, 100-year storm event would be pumped and hauled off for discharge into an acceptable MS4 that meets the requirements of the R9-2013-0001 permit, as amended by R9-2015-0001 and R9-2015-0100, NPDES CAS0109266.

San Diego Fire-Rescue currently operates three helicopters consisting of two Bell 412 helicopters and one Lockheed Martin/SikorskyS70i Firehawk. The proposed hangars are intended to accommodate these three existing helicopters, as well as one additional Lockheed Martin/SikorksyS70i Firehawk and one additional Bell 412. Project construction is anticipated to begin in Fall 2021 and last approximately 14 months. In the future condition, the Bell 412 helicopters would take off and land with tower approval from the existing concrete parking pad, while the Lockheed Martin/SikorskyS70i Firehawks would taxi from the proposed hangars along Taxiway Charlie to take off from Runway 5/23. The Lockheed Martin/SikorskyS70i Firehawks would also land at Runway 5/23 and taxi back to the proposed hangars along Taxiway Charlie.

FIGURE 1

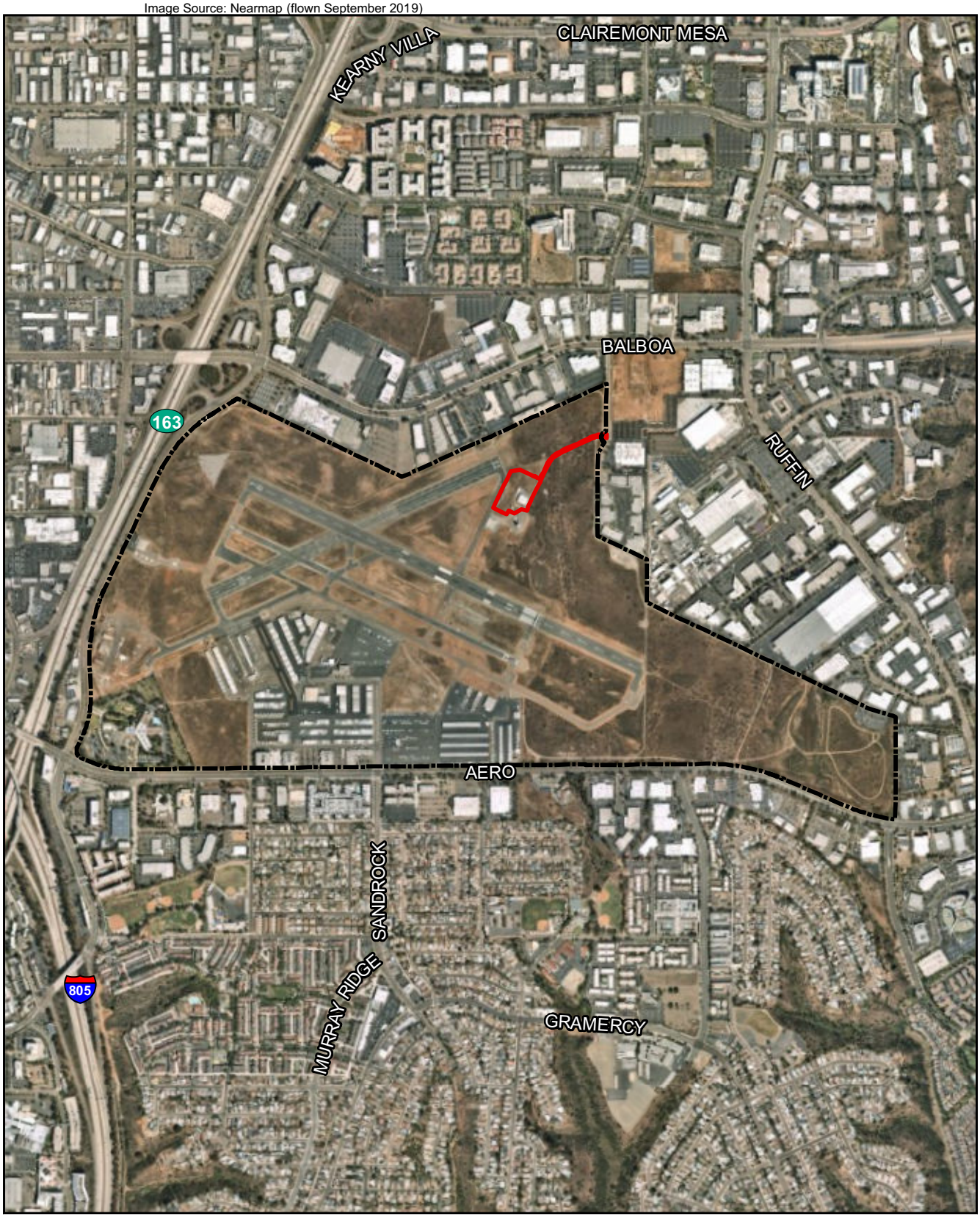
Regional Location

RECON

M:\JOBS5\9078\common_gis\fig1_EA.mxd 12/20/2019 fmm

This page intentionally left blank

Image Source: Nearmap (flown September 2019)



0 Feet 1,500

Project Boundary
Airport Boundary

RECON

M:\JOBS5\9078\common_gis\fig2_EA.mxd 12/20/2019 fmm

FIGURE 2
Airport Boundary

This page intentionally left blank

Image Source: Nearmap (flown September 2019)

Proposed Action Footprint

RECON

M:\JOBS5\9078\common_gis\fig3_EA.mxd 2/20/2020 fmm

FIGURE 3

Proposed Action Footprint

This page intentionally left blank

1.4 Purpose and Need

Consistent with FAA Order 5050.4B, paragraph 706b, the statement of Purpose and Need describes the FAA's statutory objectives related to the approval of the sponsor's proposed development, summarizes the benefits of FAA's decision, and describes the proposed time frame for carrying out the action.

1.4.1 Sponsors Purpose and Need

The purpose of the Proposed Action is to provide hangar space to the Fire-Rescue AirOps at MYF. AirOps is a 24/7, 365-day operating facility. The need for the Proposed Action results from the lack of hangar space at MYF to support AirOps. The San Diego Fire Department Hangar Feasibility Study concluded that 30,000 square feet of hangar space is required to meet future needs of the AirOps fleet (Atkins 2017).

1.5 Requested Federal Action

The federal action that is the subject of this EA is the following:

- Unconditional approval of the portion of the ALP that depicts the Proposed Action pursuant to 49 U.S.C. § 40103(b), 44718, and 47107(a)(16), and Title 14 CFR Part 77 and Part 157.

1.6 Document Organization

The format and content of this EA conforms to the requirements of Section 102(2)(c) of the NEPA (42 U.S.C. 4321-4370h). This EA is organized into the following chapters:

Chapter 1: Purpose and Need – Provides a brief description of the airport, Proposed Action, and purpose and need for the project.

Chapter 2: Alternatives – Identifies alternatives to the Proposed Action and applies screening criteria to determine which alternatives should be carried forward for further environmental analysis.

Chapter 3: Affected Environment – Describes the study area and existing land use and demographic conditions.

Chapter 4: Environmental Consequences – Discusses environmental impacts, avoidance and minimization measures, and compares the impacts associated with the Proposed Action, other alternative actions, and the No-Action Alternative.

Chapter 5: Coordination and Public Involvement – Describes the coordination and public involvement associated with the EA process. This chapter also presents a list of federal, state, and local agencies and other interested parties that have been involved in EA coordination efforts.

Chapter 6: List of Preparers

Chapter 7: References

Chapter 8: List of Abbreviations and Acronyms

2.0 ALTERNATIVES

2.1 Introduction

The objective of this alternatives analysis is to identify reasonable alternatives that accommodate the purpose and need identified in Chapter 1. Once identified, each alternative is evaluated in terms of its ability to satisfy the objectives of the purpose and need for the project and its potential for an effect on the surrounding environment. The results of this evaluation are to determine which alternatives will be considered reasonable and practicable, thereby warranting further consideration. The alternatives under consideration are more closely evaluated in Chapter 4 of this document.

CEQ regulations (Title 40 CFR § 1502.14), regarding implementation of the NEPA, require that Federal agencies perform the following tasks:

- Rigorously explore and objectively evaluate all reasonable alternatives and, for alternatives which were eliminated from detailed study, briefly discuss the reasons for having been eliminated;
- Devote substantial treatment to each alternative considered in detail, including the Proposed Action, so that reviewers may evaluate their comparative merits;
- Include reasonable alternatives not within the jurisdiction of the lead agency; and
- Include the alternative of No Action.

As stated in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, alternatives can be eliminated from further consideration when the alternatives do not fulfill the purpose and need for the action or cannot be reasonably implemented. As discussed above, CEQ §1502.14(c) requires the evaluation of the No Action alternative regardless of whether it meets the stated purpose and need or is reasonable to implement.

2.2 Alternative Screening Process

The purpose of the Proposed Action (see Section 1.4.1) is to provide at least 30,000 square feet of hangar space to meet the needs of the AirOps fleet, which currently operates without any hangar space at MYF. Based on the project purpose and need, a screening process was formulated for the alternatives under consideration.

Reasonable alternatives to the Proposed Action, including the No-Action Alternative, were identified and evaluated in this EA in accordance with NEPA, CEQ guidance, and FAA guidance and policy.

2.3 Alternatives Considered But Eliminated

The City went through an iterative analysis that developed the following five design options in the study area:

- Option A utilized a 'stacked' hangar configuration that would allow four helicopters to be arranged in a stacked or staggered pattern in the hangar. Since there is at least one helicopter on alert parked on the apron, the fifth location would be empty most of the time and only used during inclement weather. Hangars designed for Option A were located along the northern and western sides of the Flight Service Station (FSS) building.

- Option B utilized a stacked hangar configuration, but the hangar was placed north of the FSS building, facing west. Because of the hangar dimensions, this orientation works better for hangar/apron operations, but does not face the direction preferred by the San Diego Fire-Rescue. Due to the unique characteristics of the site, the long axis of the hangar works best if oriented along the long axis of the site, which, in this case, is roughly north and south. Option B is unsuitable for implementation because the northwest portion of the hangar encroaches into the ROFA. Therefore, Option B was eliminated.

- Option C utilized a stacked hangar configuration, and the hangar would be located within the footprint of the FSS building, facing west. Under Option C, the FSS building would be relocated and a new Operations structure would be constructed in an area just north of the hangar. This configuration would free up additional space for parking and support activities, and would not encroach into the ROFA. Additionally, construction within the footprint of the FSS building would shift the hangar further southeast, reducing the potential for Air Traffic Control Tower line of sight obstructions. However, relocation of the FSS building was considered infeasible. Therefore, Option C was eliminated.

- Option D utilized a single-file hangar configuration that illustrates the tightness of the site and the problems of siting such a hangar configuration. This configuration could never be used in a north orientation since the long axis of the hangar could not fit within the short axis of the site. Due to the length (328 feet), it takes up a large portion of the Proposed Action site, Option D also could not fit in an east/west orientation (hangar door facing north), and would also require relocation of the FSS structure. Therefore, Option D was eliminated.

- Option E utilized a stacked hangar configuration, with the hangar door facing north. Similar to Option C, the hangar would be located within the footprint of the FSS building, and a new Operations structure would be constructed in an area just north of the hangar However, there is limited space for such a structure and it would likely have to be two stories to provide the square footage required. Therefore, Option E was eliminated.

As described above, Options B through E were eliminated. An updated version of Option A that was refined through a Line of Sight Analysis was ultimately selected as the Proposed Action.

2.4 Alternatives Given Further Consideration

2.4.1 Proposed Action Alternative

The Proposed Action is described in detail in Section 1.3. The Proposed Action would achieve the purpose and need of the project by providing at least 30,000 square feet of hangar space to meet the futures needs of the AirOps fleet, which currently operates without any hangar space at MYF.

2.4.2 No Action Alternative

Under the No Action alternative, the approximately 32,000 square feet of prefabricated metal hangar buildings, the approximately 65,000-square-foot concrete apron, and the proposed parking and shelter for a single helitender and two fueling tender vehicles would not be constructed. Under the No Action alternative, the AirOps facility would continue to operate without any hangar space at MYF, and the City would still acquire one additional Lockheed Martin/SikorksyS70i Firehawk and one additional Bell 412. Additionally, the existing utility connections (sewer, storm water, gas, water, power, etc.) within the main access roadway from Ponderosa Avenue would not be designed and relocated, and the proposed storm water retention features would not be constructed.

2.5 Applicable Federal Laws and Executive Orders

In addition to complying with NEPA, the CEQ Regulations for Implementing NEPA, and FAA Orders 1050.1F and 5050.4B, the Proposed Action must comply with the following federal laws and executive orders, which are addressed in this EA as applicable.

- Airport and Airway Improvement Act of 1982, as amended (Public Law [P.L.] 97-248; 43 CFR §2640)
- Archaeological and Historic Preservation Act of 1974 (P.L. 86-253, as amended by P.L. 93-291, 16 U.S.C. §469)
- Clean Air Act of 1977 (as amended) (42 U.S.C. §7409 et seq.)
- Coastal Zone Management Act (16 U.S.C. §1451-1464; P.L. 92-583)
- Comprehensive Environmental Response Compensation Liability Act (42 U.S.C. §9601; P.L. 96-510)
- Department of Transportation Act of 1966, as amended (P.L. 89-670)
- Federal Endangered Species Act of 1973 (P.L. 85-624; 16 U.S.C. §§661, 664 note, 1008 note)
- Executive Order 11988 – *Floodplain Management*
- Executive Order 11990 – *Protection of Wetlands*
- Executive Order 12088 – *Federal Compliance with Pollution Control Standards*
- Executive Order 12898 – *Environmental Justice*
- Farmland Protection Policy Act (P.L. 97-98; 7 CFR Part 658)
- National Historic Preservation Act of 1966 Section 106, (16 U.S.C. §470[f]; P.L. 89-665)
- Noise Control Act of 1972 (P.L. 92-574; 42 U.S.C. §4901)
- Water Pollution Control Act, as amended by the Clean Water Act (CWA) of 1977 (33 U.S.C. §1251 et seq.)
- Wild and Scenic Rivers Act, as amended (16 U.S.C. §1271 et seq.; P.L. 90-542)

3.0 AFFECTED ENVIRONMENT

This chapter describes the existing physical, natural, and human environmental conditions within those areas that would be directly, or indirectly, affected by the project alternatives. The information describes the airport environs and provides information by which potential environmental impacts of the alternatives retained for detailed evaluation can be assessed and compared. The environmental resource categories are organized as identified in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

As outlined within FAA Order 5050.4B, paragraph 706.f.49 concise analyses were undertaken only for potential impacts that the alternatives under consideration may cause. The following resources were evaluated but are excluded from detailed analysis in the Draft EA because it was determined that these resources do not occur within the study area or would not be directly or indirectly impacted by the project alternatives.

- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Historical, Architectural, Archeological, and Cultural Resources
- Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources: Floodplains
- Water Resources: Wild and Scenic Rivers

Table 1 presents the results of the analysis that determined that these resources do not occur within the study area or would not be directly or indirectly impacted by the project alternatives.

Table 1. Resource Categories Not Affected

Resource Categories	Analysis
Coastal Resources	The Proposed Action site is located approximately seven miles east from the Pacific Ocean and is not located within the Coastal Zone Boundary established for San Diego County under the Coastal Zone Management Program.
Department of Transportation Act, Section 4(f)	There are no Section 4(f) resources on or immediately adjacent to the Proposed Action site. As described in Section 3.10.1 below, three historic addresses have been recorded within the one-mile search radius, but none of these are located within the Proposed Action site. Three publicly owned parks are located 0.5 mile or greater south of the Proposed Action site, beyond the MYF airport boundary.
Farmlands	The Proposed Action does not involve land acquisition or the conversion of agricultural land to airport use. The airport was established in 1937 by William Gibbs (initially known as Gibbs Field) and was used to train U.S. Army Air Corps cadets. The airport has been operating as public-use airport since the City purchased Gibbs Field in 1947. The California Department of Conservation “California Important Farmland Finder” classifies the Proposed Action site as “urban and built up land” (California Department of Conservation 2016). Because the airport land is not considered “farmland,” was developed prior to 1984, and is committed to urban development, the provisions of the Farmland Protection Policy Act do not apply.
Historical, Architectural, Archeological, and Cultural Resources	An Historical Resources Survey prepared for the Proposed Action (RECON Environmental, Inc. [RECON] 2019a) (Appendix B). A records search utilizing a one-mile radius buffer surrounding the 6.5-acre Area of Potential Effect (APE) was completed by the South Coastal Information Center at San Diego State University on June 15, 2018. The record search determined that 43 cultural resources investigations have been completed within a one-mile radius of the APE. The record search also identified three recorded historic-era cultural resources, one prehistoric cultural resource, and one prehistoric isolated artifact within a one-mile radius of the APE. The historic resources consist of industrial and commercial buildings. The prehistoric resource consists of a lithic and shell scatter. None of these previously recorded cultural resources are present within the APE. A total of three historic addresses have been recorded within the one-mile search radius, none of which are within the APE. A field survey of the APE was conducted on June 13, 2018 by RECON archaeologist Harry Price accompanied by Kaci Brown, a Native American representative from Red Tail Environmental. The field survey did not identify any cultural material within the APE. Large patches of reddish sandstone and cobble lenses cover the ground surface in much of the Survey Area. The APE has been scraped in the past, probably for the initial brushing of the area, exposing subsoils. Numerous broken cobbles were noted on the surface. The cobbles were likely broken as a result of past scraping and mowing and/or from natural fracturing. Surface gravel and small amounts of concrete and asphalt pieces were in the area between the existing control tower and the runway. The large parking pad at the southwest end of the Survey Area was not surveyed, nor was the taxi lane along the western edge of the Survey Area, because the ground surface is covered by either asphalt or concrete in both these locations. The possibility of significant historical resources being present within the APE is considered low. The topsoil within the APE has been scraped away in the past, leaving no suitable areas where potentially significant prehistoric or historic cultural resources could be present.

Table 1. Resource Categories Not Affected

Resource Categories	Analysis
Land Use	The Proposed Action site and MYF are located within a highly urbanized area in the southern portion of the Kearny Mesa Community Plan in the city of San Diego. The Kearny Mesa Community Planning Area is located approximately six miles east of the Pacific Ocean and 18 miles north of Tijuana, Baja California, Mexico. This community is a major industrial and commercial center, with nearby land uses mostly compatible with the airport. Existing commercial, office, and industrial uses surround the airport on all sides. Residential land uses exist less than one mile north of the Proposed Action site, about one mile southwest of Runway 5, south of the airport property, and less than two miles west of the departure end of Runway 28R. MYF has been operating as public-use airport since the City purchased Gibbs Field in 1947. The majority of the Proposed Action site consists of undeveloped vegetated land that is regularly mowed as part of airport maintenance activities. The Proposed Action site also includes developed land associated with the existing Airport facilities. Planned and future land uses in the vicinity of the Proposed Action site consist of future projects identified in the MYF Airport Master Plan listed in Section 4.4, Cumulative Effects.
Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks	The Proposed Action site is within the existing airfield and does not support residences or commercial activity. As described in Section 3.2, MYF is located in a highly urbanized industrial and commercial community and is surrounded by a mix of commercial, office, and industrial uses on all sides. The Proposed Action site is located within the San Diego County (West Central)–San Diego City (Central/Clairemont and Kearny Mesa) Public Use Microdata Area (PUMA). U.S. Census data indicates that the ethnic makeup of the San Diego City (Central/Clairemont & Kearny Mesa) PUMA consists primarily Non-Hispanic White (52.1 percent), followed by lower percentages of Hispanic or Latino Origin (24.4 percent), Asian and Pacific Islander (14.5 percent), Black or African American (5.2 percent), two or more races, (3.2 percent), Native American (0.5 percent), and other race (0.2 percent). In comparison, the San Diego County reported a lower percentage of Non-Hispanic White residents (45.1 percent) and higher percentages of Hispanic or Latino origin residents (34.0 percent). The percentage of Asian and Pacific Islander (12.2 percent), and Black or African American (4.8 percent), and Native American (0.4 percent) were slightly lower. The percentage of two or more races (3.5 percent) was slightly higher, while the percentage of other race (0.2 percent) was the same (U.S. Department of Commerce 2018). In terms of income comparisons, slightly more residents in the San Diego City (Central/Clairemont and Kearny Mesa) PUMA (13 percent) were below the poverty level compared to the county (11.4 percent) (U.S. Department of Commerce 2018). The estimated median household income was $84,666 for the San Diego City (Central/Clairemont and Kearny Mesa) PUMA, which was higher than the median household income for the county ($79,079) (U.S. Department of Commerce 2018). Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, requires federal agencies to determine whether a Proposed Action would result in environmental health risks and safety risks that may disproportionately affect children. The closest school is Angier Elementary

Table 1. Resource Categories Not Affected

Resource Categories	Analysis
	School, located beyond the MYF airport boundary and approximately one mile southwest of the Proposed Action site. The Proposed Action site currently supports helicopter operations, and the Proposed Action would support continued helicopter operations. Therefore, the Proposed Action would not introduce new uses that would increase risk to children. The airport property is fenced. Helicopter flight operations would utilize approved landing and departure paths that are approved by MYF and FAA, which took child safety into consideration during their development.
Visual Effects	Sources of existing lighting in the vicinity include lighting at MYF and lighting associated with nighttime commercial, residential, and local roads in the surrounding area. Existing airport lighting at MYF consists of runway lighting, approach lighting, and apron lighting to allow for aircraft activities. The Proposed Action site and surrounding areas do not currently have lighting. The Proposed Action would introduce blue light-emitting diode (LED) lighting consisting of a combination of pavement and elevated edge lighting. This lighting would be consistent with other light sources located throughout MYF and would be consistent with the existing visual character of the airport. The visual character of MYF consists of runways and airport facilities, surrounded by undeveloped vegetated land that is regularly mowed as part of airport maintenance activities. MYF is located within the Kearny Mesa Community Planning Area, which is a highly urbanized industrial and commercial community within the city of San Diego. MYF is surrounded by a mix commercial, office, and industrial uses on all sides. Due to the flat topography and surrounding urban development, direct views of the Proposed Action site are either not provided or are partially obscured. Views from adjacent parcels are obscured by fencing, and what is visible of the Proposed Action site appears as existing airport facilities and surrounding undeveloped vegetated land.
Water Resources: Floodplains	Executive Order 11988, *Floodplains Management*, directs Federal agencies to take actions to “reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains.” The FAA’s policies and procedures for implementing this executive order are contained in U.S. Department of Transportation (USDOT) Order 5650.2, *Floodplain Management and Protection.* The executive order and the USDOT order establish a policy to avoid taking an action within a 100-year floodplain where practicable. Review of Federal Emergency Management Agency (FEMA) maps (map references 06073C1617G, 06073C1610G and 06073C1628H) determined that the entire MYF, including the Proposed Action site, is designated as Zone X, which are areas determined by FEMA to be outside 0.2-percent annual chance floodplain (City of San Diego 2017). The floodplains nearest to MYF are associated with the Murray Canyon Creek south of Aero Drive, and Murphy Canyon Creek, east of Murphy Canyon Road. Both of these floodplains are located beyond the MYF airport boundary (City of San Diego 2017).
Water Resources: Wild and Scenic Rivers	According to the National Rivers Inventory, the closest wild and scenic river to the Proposed Action site is an 8.1-mile segment of Palm Canyon Creek, which is located approximately 65 miles away.

3.1 Air Quality

This analysis incorporates the results of the Air Quality Analysis prepared for the Proposed Action (RECON 2020a) (Appendix C). The Proposed Action site is located within the San Diego Air Basin (SDAB). The SDAB is currently classified as a federal non-attainment area for ozone (O_3), and a state non-attainment area for particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}), particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$), and ozone.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by the California Air Resources Board (CARB) or federal standards set by the U.S. Environmental Protection Agency. The San Diego Air Pollution Control District (SDAPCD) maintains 10 air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels.

The San Diego–Kearny Villa monitoring station located at 6125A Kearny Villa Road, approximately two miles north of the Proposed Action site, is the nearest station to the Proposed Action site. The Kearney Villa monitoring station measures ozone, nitrogen dioxide (NO_2), PM_{10}, and $PM_{2.5}$. Table 2 provides a summary of measurements collected at the Escondido monitoring station for the years 2014 through 2018.

Table 2. Summary of Air Quality Measurements Recorded at the San Diego – Kearny Villa Air Quality Monitoring Station

Pollutant/Standard	2014	2015	2016	2017	2018
Ozone					
Max. 1-hr (ppm)	0.099	0.077	0.087	0.097	0.102
Days State 1-hour Standard Exceeded (0.09 ppm)	1	0	0	2	1
Federal Max 8-hr (ppm)	0.081	0.070	0.075	0.083	0.077
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	1	0	0	4	1
Days 2015 Federal 8-hour Standard Exceeded (0.070 ppm)	4	0	3	6	5
State Max 8-hr (ppm)	0.082	0.070	0.075	0.084	0.077
Days State 8-hour Standard Exceeded (0.07 ppm)	4	0	3	6	5
Nitrogen Dioxide					
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Days Federal 1-hour Standard Exceeded (0.100 ppm)	0	0	0	0	0
Max 1-hr (ppm)	0.051	0.051	0.053	0.054	0.045
Annual Average (ppm)	0.010	0.009	0.009	0.009	0.008
PM10*					
State Max. Daily ($\mu g/m^3$)	39.0	37.0	35.0	47.0	38.0
Measured Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	0	0	0	0	0
Calculated Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	0.0	0.0	--	0.0	0.0
State Annual Average ($\mu g/m^3$)	19.5	16.7	--	17.6	18.4
Federal Max. Daily ($\mu g/m^3$)	39.0	39.0	36.0	46.0	38.0

Table 2. Summary of Air Quality Measurements Recorded at the San Diego – Kearny Villa Air Quality Monitoring Station

Pollutant/Standard	2014	2015	2016	2017	2018
Measured Days Federal 24-hour Standard Exceeded (150 μg/m^3)	0	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (150 μg/m^3)	0.0	0.0	0.0	0.0	0.0
Federal Annual Average (μg/m^3)	19.4	17.0	17.1	17.6	18.4
PM2.5*					
State Max. Daily μg/m^3)	20.2	25.7	20.3	27.5	32.2
State Annual Average (μg/m^3)	8.2	--	7.8	8.0	8.3
Federal Max. Daily (μg/m^3)	20.2	25.7	19.4	27.5	32.2
Measured Days Federal 24-hour Standard Exceeded (35 μg/m^3)	0	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (35μg/m^3)	0.0	0.0	0.0	0.0	0.0
Federal Annual Average (μg/m^3)	8.1	7.2	7.5	7.9	8.3

SOURCE: CARB 2019.
ppm = parts per million; μg/m^3 = micrograms per cubic meter; -- = Not available.
* Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

3.2 Biological Resources

This section incorporates the results of the Biological Resource Report prepared by the City Engineering and Capital Projects Department (City of San Diego 2020) (Appendix D). Surveys for the study area were performed by qualified City biologists. A number of surveys were performed, including a biological reconnaissance survey, a general habitat assessment with vegetation mapping, a focused plant survey, protocol fairy shrimp surveys, vernal pool assessment, hydrology assessment, and a general jurisdictional wetlands and waters assessment. The dates and personnel of all these surveys are provided in the Biological Resource Report completed for the Proposed Action (City of San Diego 2020) (Appendix D).

On November 2, 2018, the U.S. Fish and Wildlife Service (USFWS) provided the FAA with a list of threatened and endangered species that may occur in the Proposed Action site, and/or may be affected by the Proposed Action (Table 3). On March 17, 2020, the USFWS completed Section 7 consultation for Proposed Action and determined that the Proposed Action would be consistent with the City's Multiple Species Conservation Program (MSCP) Subarea Plan and would include all applicable conservation measures in the City's Subarea Plan to avoid and minimize potential adverse effects to the gnatcatcher (USFWS 2020). USFWS also extended the FAA an incidental take exemption for the San Diego and Riverside fairy shrimp already provided to the City through their incidental take permit for their Vernal Pool Habitat Conservation Plan (VPHCP). Through Section 7 consultation, USFWS extended to the FAA the incidental take exemption for the San Diego and Riverside fairy shrimp already provided to the City through their incidental take permit for their VPHCP. Subsequently on TBD, the FAA prepared a memorandum finding that the Proposed Action will have no effect on any federally listed flora and fauna endangered or threatened species or designated critical habitat. Copies of the USFWS list and FAA memo are included in Appendix A. [FAA Memo to be added.]

Table 3. USFWS List of Threatened and Endangered Species

Name	Status
BIRDS	
California least tern (*Sterna antillarum browni)*	Endangered
Coastal California gnatcatcher (*Polioptila californica californica*)	Threatened
Least Bell's Vireo (*Vireo belli pusillus*)	Endangered
Light-footed clapper rail (*Rallus longirostris levipes)*	Endangered
Southwestern willow flycatcher (*Empidonax traillii extimus*)	Endangered
Western snowy plover (*Charadrius nivosus nivosus*)	Threatened
CRUSTACEANS	
Riverside fairy shrimp (*Streptocephalus woottoni*)	Endangered
San Diego fairy shrimp (*Branchinecta sandiegonensis*)	Endangered
FLOWERING PLANTS	
California Orcutt Grass (*Orcuttia californica)*	Endangered
Salt Marsh Bird's-beak (*Cordylanthus maritimus ssp. Maritimus*)	Endangered
San Diego Ambrosia (*Ambrosia pumila*)	Endangered
San Diego Button-celery (*Eryngium aristulatum var. parishii*)	Endangered
San Diego Mesa-mint (*Pogogyne abramsii*)	Endangered
San Diego Thornmint (*Acanthomintha ilicifolia*)	Threatened
Spreading Navarretia (*Navarretia fossalis*)	Threatened
Willowy Monardella (*Monardella viminea*)	Endangered
CRITICAL HABITATS	
San Diego Fairy Shrimp (*Branchinecta sandiegonensis*)	Final
Spreading Navarretia (*Navarretia fossalis*)	Final

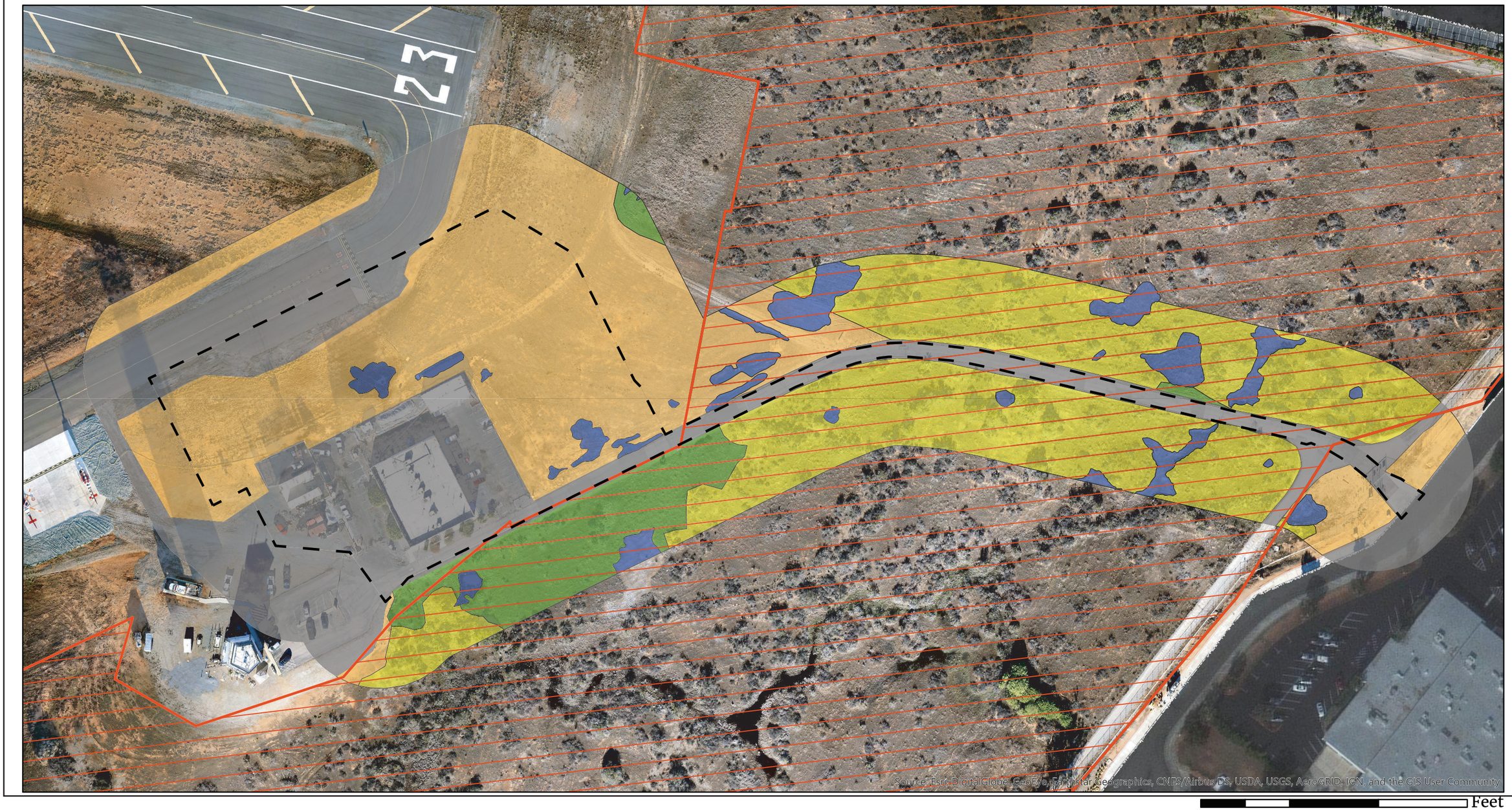
SOURCE: USFWS 2020

3.2.1 Vegetation Communities and Sensitive Plants

Vegetation communities within the Proposed Action site and 100-foot survey buffer area consist of Diegan coastal sage scrub, Non-native grassland, San Diego mesa hardpan vernal pool, Disturbed Habitat, and Developed Land (Figure 4). One sensitive plant species, San Diego mesa mint (*Pogogyne abramsii*), was detected within the Proposed Action site and 100-foot survey buffer area (Figure 5). Descriptions of these vegetation communities and sensitive plant species, as well as a complete list of plant species encountered during the field survey, are provided in the Biological Resource Report completed for the Proposed Action (City of San Diego 2020). The northeastern portion of the site overlaps with Critical Habitat for spreading navarretia (*Navarretia fossalis*), a federally threatened species, as designated by the United States Fish and Wildlife Service. The 100-foot survey limit overlaps with Critical Habitat for San Diego fairy shrimp (*Branchinecta sandiegonensis*) but does not overlap with the project footprint (see Figure 5).

This page intentionally left blank

Map Source: City of San Diego



Feet
0 50 100 200 300

Proposed Action Footprint
San Diego Mesa Hardpan Vernal Pool
Developed
Diegan Coastal Sage Scrub
Disturbed
Non-Native Grassland
MHPA

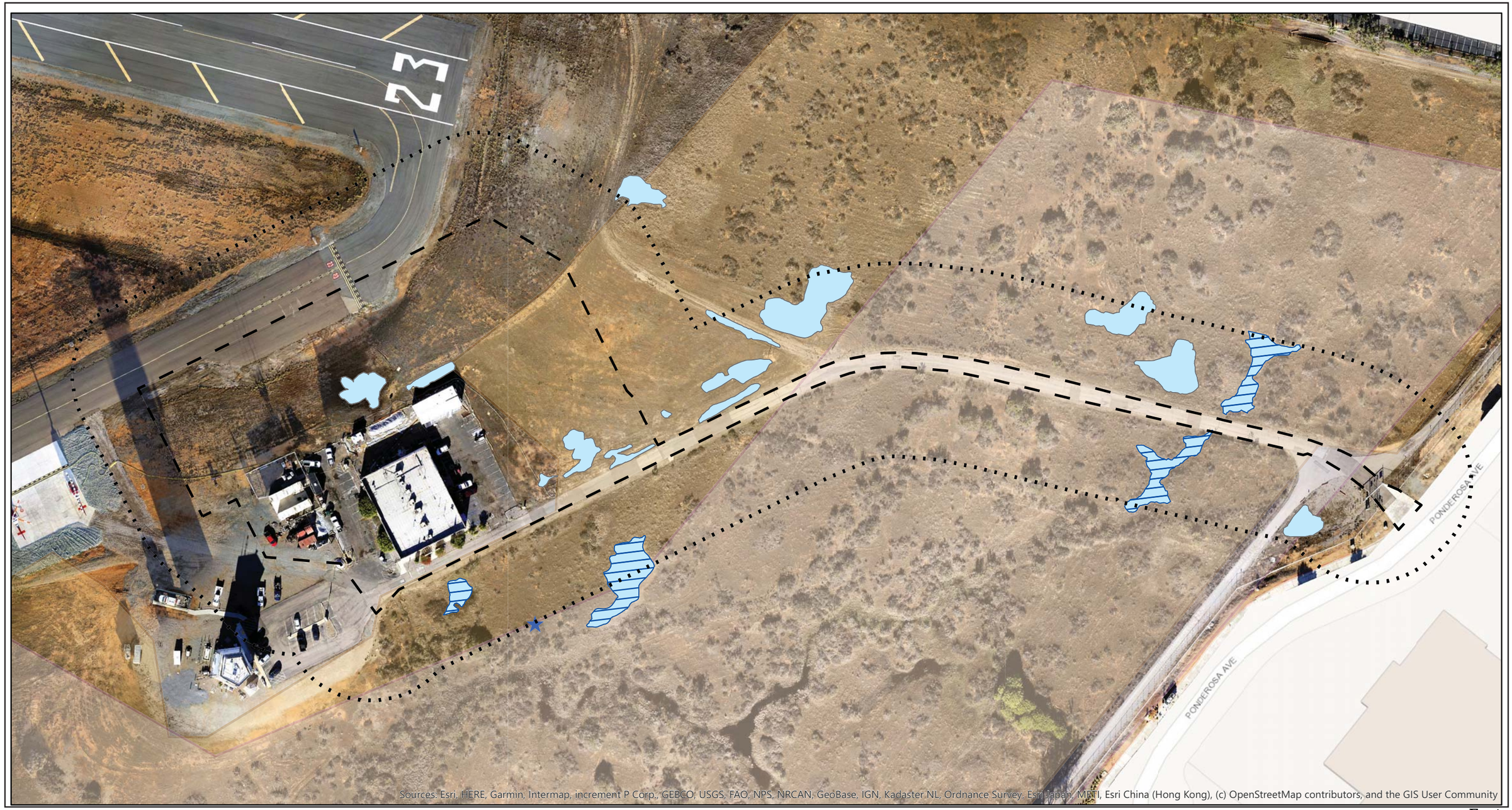
RECON

M:\JOBS5\9078\env\graphics\EA\fig4.ai 01/09/20 fmm

FIGURE 4
Vegetation Communities within the Proposed Action Footprint and 100-foot Survey Area

This page intentionally left blank

Map Source: City of San Diego



Proposed Action Footprint

100-Foot Survey Limit

Sensitive Species Observed

San Diego Mesa Mint

California Gnatcatcher

San Diego Fairy Shrimp

USFWS Critical Habitat

San Diego Fairy Shrimp Critical Habitat

Spreading Navarretia Critical Habitat

Feet

0 50 100 200 300

RECON

M:\JOBS5\9078\env\graphics\EA\fig5.ai 03/10/20 fmm

FIGURE 5

Sensitive Species Locations within the Proposed Action Footprint and 100-foot Survey Area

This page intentionally left blank

3.2.2 Sensitive Wildlife

Two sensitive wildlife species and/or their suitable habitat were identified during surveys of the Proposed Action site and 100-foot survey buffer area (see Figure 5). San Diego fairy shrimp was observed within the 100-foot survey buffer and within San Diego mesa hardpan vernal pools within the Proposed Action site (City of San Diego 2018). Coastal California gnatcatcher (*Polioptila californica californica*) is known to occur at MYF and is typically found in the south/southeastern area of the airport. One California gnatcatcher was briefly observed during a site visit approximately 100-feet east of the Proposed Action site. Descriptions of these sensitive wildlife species, as well as a complete list of wildlife species encountered during the field survey, are provided in the Biological Resource Report completed for the Proposed Action (City of San Diego 2020).

3.3 Climate

The Proposed Action site is located in the Kearny Mesa Community Planning Area of the city of San Diego, which is within SDAB that encompasses all of San Diego County. A possible concern is the potential impact of the Proposed Action on climate change. Greenhouse gases (GHGs) are those that trap heat in the Earth's atmosphere. Both naturally occurring and anthropogenic (man-made) GHGs include water vapor and carbon dioxide (CO_2). All GHG inventories measure CO_2 emissions. Beyond CO_2, different inventories include different GHGs such as methane (CH_4), nitrous oxide (NO_X), and ozone. Research has shown that there is a direct link between fuel combustion and GHG emissions. Therefore, sources that require fuel or power at an airport are the primary sources that would generate GHGs.

3.4 Hazardous Materials, Solid Waste, and Pollution Prevention

Review of the California Department of Toxic Substances Control (DTSC) Envirostor Database (DTSC 2020) and State Water Resources Control Board (SWRCB) Geotracker Database (SWRCB 2020) determined that there are no listed hazardous materials sites located on the Proposed Action Site. All DTSC Envirostor Database (DTSC 2020) and SWRCB Geotracker Database (SWRCB 2020) listings within MYF are identified as closed. There are several active hazardous materials sites located within 0.5 mile of the Proposed Action site, but these sites are located outside of the MYF boundary. Additionally, review of the United States Environmental Protection Agency Superfund database determined that the only site within San Diego County currently listed on the National Priorities List (NPL) is United States Marine Corps Base Camp Pendleton.

3.5 Natural Resources and Energy Supply

The Proposed Action site supports existing aviation use areas. Energy demand generated by aviation uses include aviation fuel and electricity for business and ground support services, which is similar to energy demand generated at other general aviation airports.

3.6 Noise and Noise-Compatible Land Use

This analysis incorporates the results of the Noise Analysis prepared for the Proposed Action (RECON 2020b) (Appendix E). MYF is situated in a highly urbanized area in the southern portion of the Kearny Mesa Community Plan in the city of San Diego. This community is a major industrial and commercial center, with nearby land uses mostly compatible with the airport.

Existing commercial, office, and industrial uses surround the airport on all sides. Residential land uses exist less than one mile north of the project area north of Tech Way, about one mile southwest of Runway 5, south of the airport property, and less than two miles west of the departure end of Runway 28R. Noise levels in the vicinity of the airport are expected to increase in the future, primarily due to a projected increase in aircraft operations. In addition, the fleet is expected to shift to a higher proportion of business jets and twin-engine turboprops and a lower proportion of single-engine piston aircraft.

The City is currently developing an airport master plan that will establish the long-term development plan for MYF. As a part of this process, the City has developed an existing environmental overview that included baseline year 2017 noise contours. As shown in Figure 6, the Proposed Action site is located within the 65 and 60 Community Noise Equivalent Level (CNEL) noise contour for MYF. Additionally, San Diego Fire-Rescue currently operates three helicopters consisting of two Bell 412 helicopters and one Lockheed Martin/SikorskyS70i Firehawk. These helicopter operations were added to the baseline Montgomery-Gibbs Executive Airport operations to obtain existing year 2020 noise contours. These noise contours are shown in Figure 7.

3.7 Water Resources

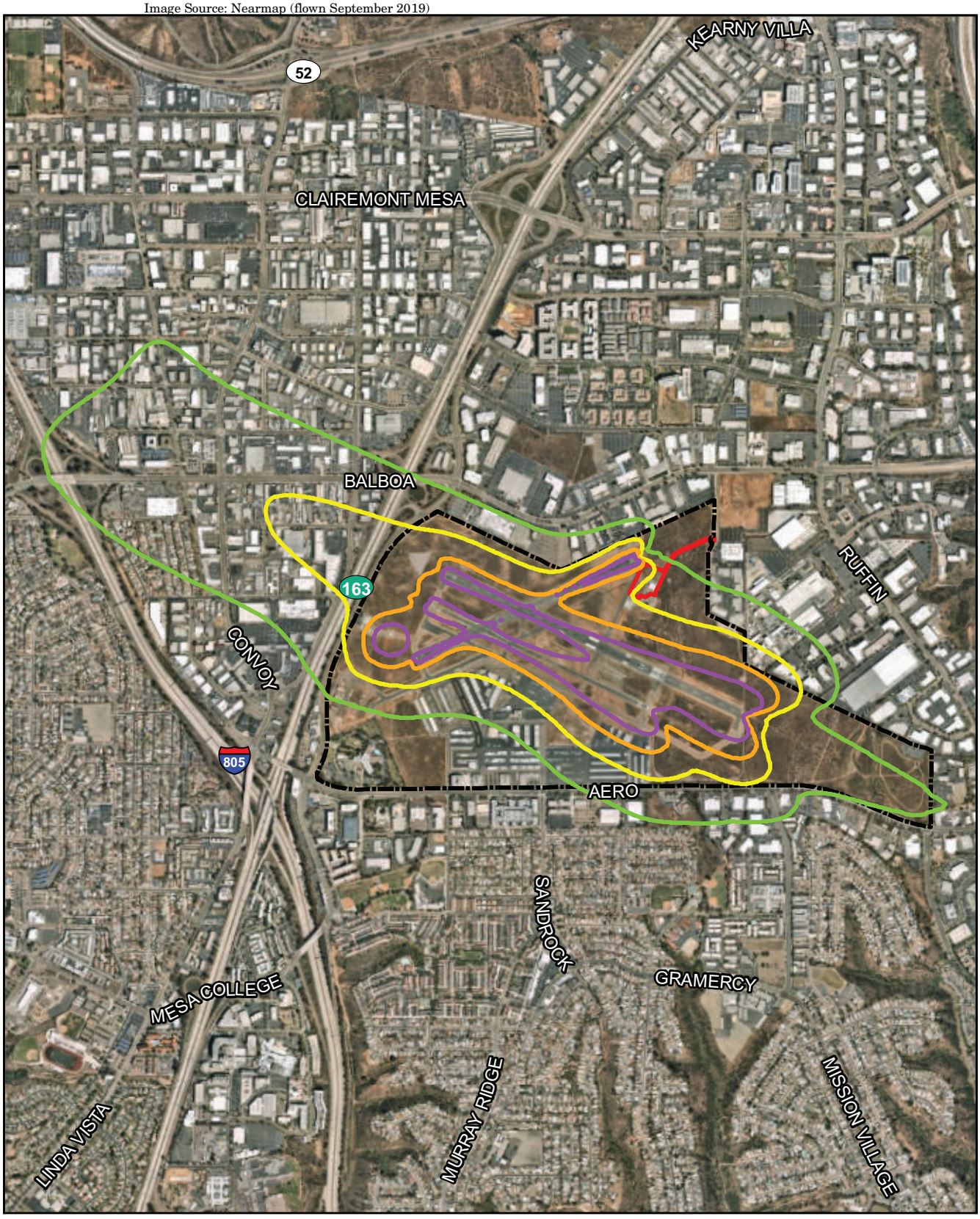
This section covers wetlands and surface waters and groundwater. Floodplains and wild and scenic rivers are discussed in Table 1 above.

3.7.1 Wetlands

This section incorporates information from the Jurisdictional Waters/Wetland Delineation Report prepared for the Proposed Action (RECON 2019b) (Appendix F). A routine aquatic resource delineation was performed on July 17, 2019. The Survey Area consisted of the Proposed Action site, plus a 100-foot buffer around the main portion of the Proposed Action site (no buffer along the access road), totaling 7.98 acres. A follow-up site visit was conducted on November 1, 2019. The aquatic resources delineation was performed according to the guidelines set forth by the U.S. Army Corps of Engineers (USACE; 1987, 2008).

The aquatic resources delineated include a total of 15 vernal pools and one wetland swale within the Survey Area (Figure 8). Four of the 15 vernal pools extend outside the limits of the Survey Area. Therefore, only the areas of the portions occurring within the Survey Area were used to calculate the total acreage of jurisdictional resources within the Survey Area. The culvert that crosses under the paved access road within the Survey Area is assumed to be considered non-wetland waters of the U.S. The aquatic resource features delineated within the Survey Area total 0.187 acre of wetland waters of the U.S. and 24 square feet (15.5 linear feet) of non-wetland waters of the U.S.

Image Source: Nearmap (flown September 2019)



Project Boundary
Airport Boundary

Noise Contours
60 CNEL
65 CNEL
70 CNEL
75 CNEL

0 Feet 2,000

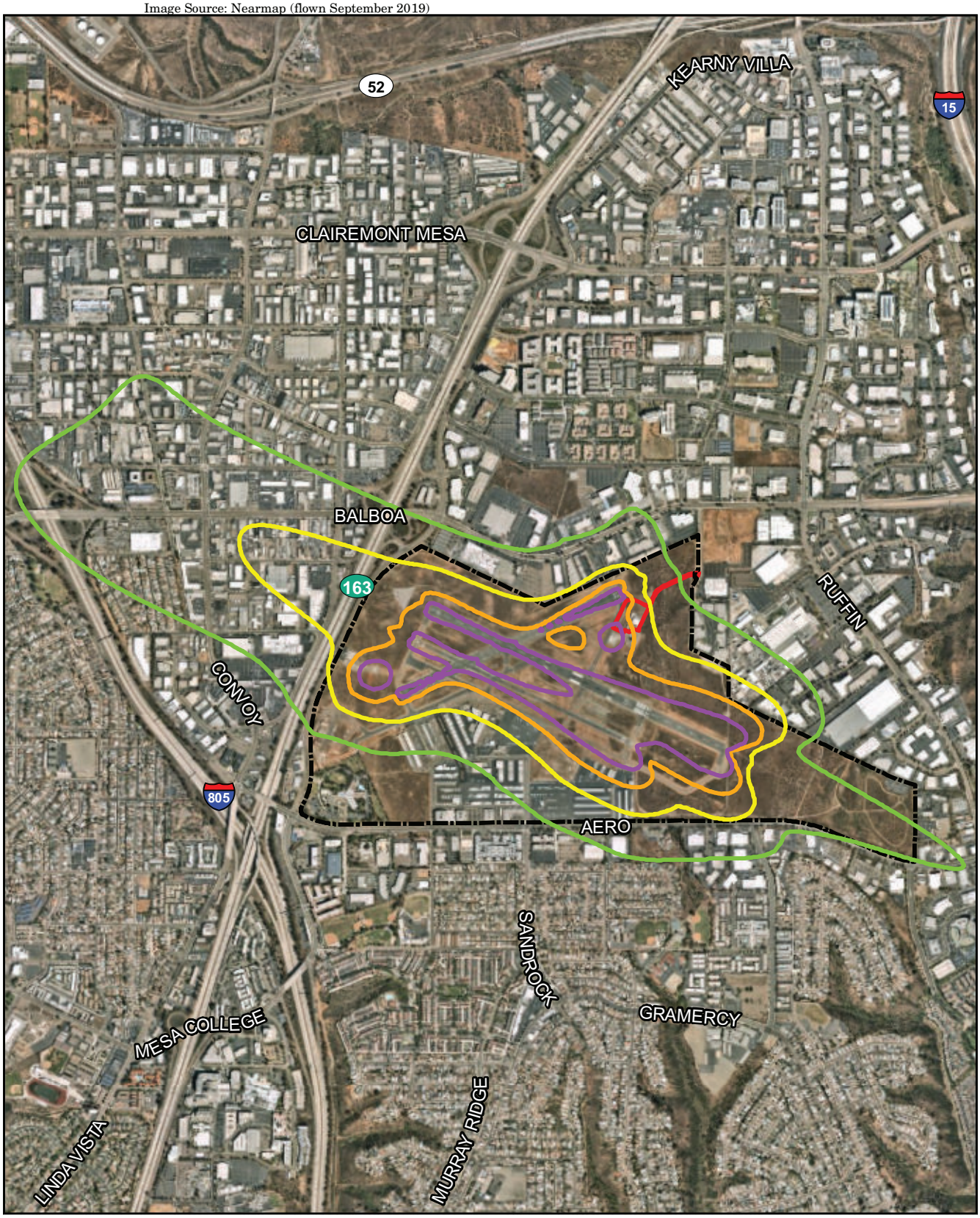
FIGURE 6
Baseline (2017) Master Plan Update Noise Contours

RECON

M:\JOBS5\9078\common_gis\fig6_EA.mxd 12/10/2020 fmm

This page intentionally left blank

Image Source: Nearmap (flown September 2019)



Project Boundary
Airport Boundary

Noise Contours
60 CNEL
65 CNEL
70 CNEL
75 CNEL

0 Feet 2,000

FIGURE 7
Existing Year 2020 Noise Contours

RECON

M:\JOBS5\9078\common_gis\fig7_EA.mxd 12/10/2020 fmm

This page intentionally left blank

Image Source: Nearmap (flown September 2019)

Survey Area

Non-wetland Waters (18-inch culvert)

Wetlands (vernal pool)

Wetlands (swale)

Wetland Data Form Point (WDP)

Upland Data Form Point (UDP)

Photo Points (PP)

Topography (2-foot Contour Interval)

0 Feet 125

RECON

M:\JOBS5\9078\common_gis\fig8_EA.mxd fmm

FIGURE 8

Waters of the U.S. within the Proposed Action Footprint and 100-foot Survey Area

This page intentionally left blank

Of the 11 vernal pools sampled within the Survey Area, nine met the hydrophytic vegetation standard via the dominance test or prevalence index and all contained a vernal pool indictor plant species as defined by USACE (USACE 1997). The remaining two vernal pools were not sufficiently dominated by hydrophytic plant species to pass the dominance test or prevalence index. However, these two pools are still considered to meet the hydrophytic vegetation parameter under a problematic wetland; where the vegetation criteria are considered met when the area meets both the hydric soils and wetland hydrology criteria. In fact, all of the vernal pools sampled within the Survey Area could be considered to be problematic wetlands for vegetation because regular mowing occurs throughout these areas, which has likely significantly altered the percent cover and distribution of hydrophytic vegetation. The four vernal pools that were not sampled include one in the northern portion of the Survey Area and three in the eastern portion, east of the access road. As mentioned above, these areas do not undergo regular mowing and, therefore, would not be considered to be problematic wetlands for vegetation. Based on data provided by the City, hydrophytic vegetation is assumed present within these four unsampled vernal pools.

Additionally, as mentioned above, all 11 of the sampled vernal pools within the Survey Area contain at least one vernal pool indicator plant species. The vernal pool indicator plant species observed includes dwarf woollyheads (*Psilocarphus brevissimus*; facultative wetland [FACW]) and Lemmon's canarygrass (*Phalaris lemmonii*; FACW). Dwarf wollyheads and hyssop loosestrife (*Lythrum hyssopifolia*; obligate) dominated the vegetation cover within the majority of the vernal pool depressions.

The swale in the southeastern portion of the Survey Area is fed by a culvert leading from the existing developed structures. The vegetation observed within this swale includes a number of herbaceous hydrophytic plant species, including hyssop loosestrife, tall flatsedge (*Cyperus eragrostis*; FACW), and toad rush (*Juncus bufonius*; FACW). Outside of the swale, the surrounding upland areas contained Diegan coastal sage scrub dominated by California buckwheat (*Eriogonum fasciculatum*; no indicator) and red brome.

The culvert that crosses under the paved access road within the Survey Area is assumed to be considered non-wetland waters of the U.S. (Figure 8). However, this culvert was not sampled during the surveys. The total estimate area for this non-wetland water feature is 24 square feet and 15.5 linear feet.

3.7.2 Surface Waters and Groundwater

This section incorporates information from the Storm Water Quality Management Plan (SWQMP) prepared for the Proposed Action (C&S Companies 2019) (Appendix G). The Proposed Action site is located within the San Diego River Watershed, Hydrologic Subarea 907.11. Runoff from the Proposed Action site currently drains to two low points within the ground disturbance area. The southern portion of the Proposed Action site drains to the northeast into an existing 24-inch corrugated metal pipe located in the parking lot near the southeastern most corner of the existing building. This pipe conveys flows underneath the paved surface discharging flows to the east into an existing natural meandering stream that conveys flows to the southeast, to a headwall immediately north of Runway 28R, then off-site further to the south into an existing underground public system within Aero Drive. The northern portion of the Proposed Action site drains east to a low point at the most northeast corner of the existing parking lot. Flows over top the existing paved road and continue southeast into the existing stream. Existing points of discharge from the

Proposed Action site eventually flow into the San Diego River and then into the Pacific Ocean Shoreline; both of which are listed on the 2006 CWA Section 303(d) List of Water Quality Limited Segments. Groundwater is anticipated to be encountered at depths of approximately 10 to 20 feet.

4.0 ENVIRONMENTAL CONSEQUENCES AND AVOIDANCE AND MINIMIZATION

This chapter discusses the potential environmental impacts that could result from implementing the Proposed Action and the No Action Alternative. Specifically, this EA considers effects on the environmental resource categories identified in FAA Order 1050.1F and its associated Desk Reference. As defined by CEQ regulations (40 CFR Section 1508.89(b), direct impacts are those which are caused by the action and occur at the same time and place (i.e., construction); whereas indirect impacts are those which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.

For the purposes of this EA, the environmental consequences have been evaluated for the Proposed Action and No Action alternatives. All other project alternatives under consideration were eliminated because they did not meet the stated project criteria (see Section 2.2). In accordance with the CEQ regulations, as contained within Title 40 CFR Section 1508.8, the No Action alternative has been retained for further environmental analysis.

4.1 Air Quality

This analysis incorporates the results of the Air Quality Analysis prepared for the Proposed Action (RECON 2020a) (see Appendix C).

4.1.1 Regulatory Setting

The General Conformity Rule applies to any federal action and requires analysis of emissions of criteria pollutants and their precursors for which an area is designated nonattainment or that is covered by a maintenance plan (FAA 2015). The General Conformity applicability analysis outlined in the Air Quality Handbook provides a range of factors to consider in determining whether the rule applies to the project/action. These factors include the following:

1. Will the action occur in a nonattainment or maintenance area(s);

2. Does a specific exemption allowed in the General Conformity Rule apply to the action;

3. Is the action, or portions of the project, included on the federal agency's list of "presumed to conform activities";

4. Do the total direct and indirect air emissions associated with the action exceed the General Conformity *de minimis* levels; and

5. Does the U.S. Environmental Protection Agency (EPA) approved State Implementation Plan have an emissions budget against which the emissions associated with the action could be compared and is the budget inclusive of the action?

If an action is not exempt or presumed to conform or found to cause emissions above applicable *de minimis* levels in any nonattainment or maintenance area, the agency must prepare a General Conformity Determination prior to taking the action (FAA 2015).

The Proposed Action site is located within the SDAB, which is a federal non-attainment area for 8-hour ozone, as well as a maintenance/attainment area for carbon monoxide (CO). Therefore, the General Conformity Rule is applicable to the project emissions of CO and ozone precursors

(volatile organic compounds [VOC] and NO_X). The General Conformity *de minimis* levels applicable to the SDAB are shown in Table 4.

Table 4. General Conformity De Minimis Limits

Pollutant	Designation Category	Emissions (Tons/Year)
Ozone Precursors (VOC or NO_X)	Non-attainment (Moderate)	100
Carbon Monoxide (CO)	Attainment (Maintenance)	100

Sources: 40 CFR 93.53(b)(1) and 40 CFR 93.53(b)(2)
Note that VOC and ROG are essentially synonymous

4.1.2 Analysis Methodology and Significance Threshold

Construction emissions were calculated using the California Emissions Estimator Model (CalEEMod) 2016.3.2 (California Air Pollution Control Officers Association 2017) which incorporates the most currently approved Emissions Factor Model and Off-Road emissions factors models. The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. The FAA's Aviation Environmental Design Tool (AEDT) version 3b was used to model the change in operational aviation air quality emissions at MYF that would result from project operation. AEDT 3b is a modeling tool that calculates noise, fuel burn, and emissions associated with aviation operations. Aircraft emissions are a function of the number of aircraft operations expressed as landing and takeoff cycles, the aircraft fleet mix, and the length of time aircraft spend in each of the modes of operation defined in AEDT. AEDT also calculates emissions from auxiliary power units and ground support equipment; however, there is no auxiliary power units usage at MYF.

The FAA's significance threshold would be exceeded if the Proposed Action would cause pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS), as established by the U.S. EPA under the federal Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations. The significance criteria established by the applicable air pollution control district (SDAPCD) may be relied upon to make impact significance determinations.

4.1.3 Proposed Action

Direct Impacts

Construction

As shown in Table 5, maximum daily construction emissions associated with the project are projected to be less than the applicable SDAPCD screening levels for all criteria pollutants. Additionally, as shown in Table 6, total annual construction emissions would be well less than the applicable General Conformity *de minimis* levels. Therefore, air quality impacts during construction activities would not result in adverse air quality impacts and a General Conformity determination is neither applicable nor required.

Table 5. Summary of Maximum Daily Construction Emissions (pounds per day)

Construction	Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Site Preparation	4	42	22	<1	20	12
Building Construction	2	20	17	<1	1	1
Paving	1	13	15	<1	1	1
Maximum Daily Emissions	**4**	**42**	**22**	**<1**	**20**	**12**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

Table 6. Summary of Total Annual Construction Emissions (tons per year)

Construction	Emissions					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2020	0.08	0.77	0.60	<0.01	0.14	0.09
2021	0.12	1.11	1.08	<0.01	0.07	0.06
Total	0.20	1.88	1.67	<0.01	0.21	0.15
General Conformity de minimis level	*100*	*100*	*100*	--	--	--

Operation

As shown in Table 7, maximum daily AirOps emissions are projected to be less than the applicable SDAPCD screening levels for all criteria pollutants. As shown in Table 8, total annual AirOps emissions would be well less than the applicable General Conformity *de minimis* levels. Consequently, air quality impacts during operation would not exceed the NAAQS or California Ambient Air Quality Standards or contribute to existing violations and would not result in adverse air quality impacts. Therefore, a General Conformity determination is neither applicable nor required.

Table 7. Maximum Daily AirOps Emissions (pounds per day)

	Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing	1	10	6	2	<1	<1
Year 2022	1	12	12	3	<1	<1
Year 2027	1	16	12	3	<1	<1
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

Table 8. Maximum Annual AirOps Emissions (tons per year)

Construction	Emissions					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing	0.10	1.75	1.16	0.36	<0.01	<0.01
Year 2022	0.16	2.24	2.10	0.47	<0.01	<0.01
Year 2027	0.17	2.87	2.21	0.60	<0.01	<0.01
General Conformity de minimis level	*100*	*100*	*100*	--	--	--

Indirect Impacts

The Proposed Action would not create capacity for additional aircraft operations and would have no impact on any other MYF aircraft operations. Therefore, the Proposed Action would not result in any indirect impacts related to air quality.

4.1.4 No Action Alternative

Under the No Action Alternative, no construction activities would occur that would generate any new air quality emissions, and the AirOps facility would continue to operate without any hangar space at MYF. Therefore, it would not result in an additional impact related to air quality.

The Proposed Action would result in construction and operational air quality emissions compared to the No Action Alternative. These increases would not cause an exceedance of the NAAQS standards.

4.2 Biological Resources

This impact analysis incorporates the results of the Biological Resources Report prepared for the Proposed Action (City of San Diego 2020) (see Appendix D).

4.2.1 Regulatory Setting

Several federal statutes, regulations, executive orders, and policies must be considered when potential impacts to biological resources may occur as a result of a federal action.

- The Endangered Species Act (ESA) (16 U.S.C. §1531 et seq.) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered 'take' under the ESA. Section 9(a) of the ESA defines 'take' as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." The ESA is administered by the USFWS and the National Marine Fisheries Service. The USFWS has jurisdiction over terrestrial and freshwater species.
- The Migratory Bird Treaty Act (MBTA) (16 U.S.C. §§ 703-712) protects migratory birds, including their active nests, eggs, and parts, from possession, sale, purchase, barter, transport, import, export, and take. The USFWS is the federal agency responsible for the

management of migratory birds as they spend time in habitats of the U.S. For purposes of the MBTA, "take" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect" (50 CFR § 10.12). The MBTA applies to migratory birds that are identified in 50 CFR § 10.13 (defined hereafter as "migratory birds").

- The MSCP is a comprehensive, long-term habitat conservation planning program that covers approximately 900 square miles in southwestern San Diego County under the federal and state ESA and state Natural Communities Conservation Plan Act of 1991. Local jurisdictions, including the City, implement their portions of the regional umbrella MSCP through Subarea Plans, which describe specific implementing mechanisms. The City's MSCP Subarea Plan, approved in March 1997, established the process for the issuance of incidental take permits (ITP) for listed species under Section 10(a)(1)(B) of the federal ESA and Section 2835 under the state ESA. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth. "MSCP Covered" refers to species covered by the City's federal ITP issued pursuant to Section 10(a) of the federal ESA (16 United States Code § 1539(a)(2)(A)). Under the federal ESA, an ITP is required when non-federal activities would result in "take" of a threatened or endangered species. The City Multi-Habitat Planning Area (MHPA) is a "hard line" preserve developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur. The MHPA is considered an urban preserve that is constrained by existing or approved development and is comprised of habitat linkages connecting several large core areas of habitat.
- The VPHCP provides a regulatory framework to protect, enhance, and restore vernal pool resources in specific areas within the City's jurisdiction, while improving and streamlining the environmental permitting process for impacts to threatened and endangered species associated with vernal pools. The VPHCP is a conservation plan for vernal pools and seven threatened and endangered species that do not have federal coverage under the City's MSCP Subarea Plan, including five plant and two crustacean species. The VPHCP expands the City's existing MHPA established in the MSCP Subarea Plan to conserve additional lands with vernal pools that are occupied with the vernal pool covered species. Implementation of the VPHCP occurs through permanent protection of existing City-owned land for the conservation of vernal pools, conservation of private lands through the development entitlement process, the permanent management and monitoring of these lands, and annual reporting to the Wildlife Agencies that accounts for all take authorized, conservation achieved, and compliance and effectiveness monitoring (City of San Diego 2019).

4.2.2 Analysis Methodology and Significance Threshold

The FAA's significance threshold would be exceeded if the Proposed Action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat. The FAA has not established a significance threshold for non-listed species.

4.2.3 Proposed Action

Direct Impacts

Vegetation Communities and Sensitive Plants

Table 9 shows that the Proposed Action would permanently impact 3.719 acres of land. No mitigation is required for impacts to disturbed habitat or developed land. However, impacts to wetland habitats, San Diego mesa hardpan vernal pools (occupied with San Diego fairy shrimp), and San Diego mesa vernal pools (not occupied, but suitable habitat for San Diego fairy shrimp) would require restoration.

Table 9. Direct Impacts to Vegetation Communities (On-Site)

Vegetation Type	Direct Impacts (acres)*
Upland	
Developed	1.747
Disturbed	1.883
Wetland	
San Diego Mesa Hardpan Vernal Pool (occupied with San Diego Fairy Shrimp)	0.087
San Diego Mesa Vernal Pool (not occupied, but suitable habitat for San Diego fairy shrimp)	0.002
Total	**3.719**

*Values may vary slightly due to rounding errors.
Source: City of San Diego 2020

Critical habitat for spreading navarretia overlaps with the project footprint and is anticipated to be impacted. Approximately 1.014 acres (0.039 acre of San Diego mesa hardpan vernal pool, 0.637 acre of disturbed habitat, and 0.338 acre of existing road) of spreading navarretia critical habitat will be impacted by project construction. The existing road does traverse through San Diego fairy shrimp critical habitat. Impacts to critical habitat are covered under the City's VPHCP and discussed further below (City of San Diego 2019).

The Proposed Action would result in impacts to San Diego fairy shrimp and spreading navarretia critical habitat, both covered by the VPHCP. The VPHCP allows the impact of heavily degraded pools, outside the MHPA, in exchange for the preservation and restoration of high-quality pools in the MHPA. Management, maintenance, enhancement, and/or restoration of conserved vernal pool complexes containing Critical Habitat, as described in the project's Vernal Pool Maintenance and Monitoring Program, would result in a net biological benefit for all these species and their Critical Habitats. Impacts to spreading navarretia critical habitat are consistent with the VPHCP and would be offset through the long-term implementation of the VPHCP.

The Proposed Action would not impact any vernal pools occupied by spreading navarretia. To offset impacts to vernal pools associated with the Proposed Action and other City projects, the City is proposing to restore a vernal pool complex (J13N) south of Airway Road and Caliente Avenue in the Otay Mesa Community Planning Area that would be utilized as a restoration site for impacts to vernal pools. Implementation of this restoration site would include restoration of

vernal pools impacted by the Proposed Action. This restoration site is being implemented consistent with the requirements of the City's VPHCP

Sensitive Wildlife

San Diego fairy shrimp is listed as endangered by USFWS and is a VPHCP covered species. This species was observed within the 100-foot survey buffer and within five vernal pools within the Proposed Action site within San Diego mesa hardpan vernal pools. The Proposed Action would implement avoidance and minimization measures described below to avoid impacts to this species consistent with the requirements of the VPHCP.

Indirect Impacts

Vegetation Communities and Sensitive Plants

San Diego mesa mint is a federally- and state-endangered, California Rare Plant Rank 1B.1 MSCP-covered and narrow endemic species that was observed within the 100-foot survey buffer in San Diego mesa hardpan vernal pools. This species will not be directly impacted by the Proposed Action. However, due to its proximity to the Proposed Action site, there is a potential for this species to be indirectly impacted. The Proposed Action would implement avoidance and minimization measures described below to avoid indirect impacts to this species.

Sensitive Wildlife

Coastal California gnatcatcher is federally-listed as Threatened, is designated as a Species of Special Concern by the CDFW and is a MSCP-covered species. California gnatcatcher is known to occur on MYF and is typically found in the south/southeastern area of the airport. One coastal California gnatcatcher was briefly observed during a site visit approximately 100 feet east of the Proposed Action site. The Proposed Action site does not contain appropriate nesting habitat and is composed of low-quality foraging habitat. The Proposed Action would implement avoidance and minimization measures described below to avoid indirect impacts to this species.

4.2.3.1 Avoidance and Minimization Measures

As described herein, the Proposed Action site incorporates avoidance and minimization measures to minimize project effects.

BIO-1 Habitat Restoration

Impacts to San Diego Mesa Hardpan vernal pool will be avoided through re-establishment and restoration of vernal pools, at the South Otay 1-acre parcels (J13N) in accordance with the requirements of the City's VPHCP and Biology Guidelines. The restoration plan includes the seeding of sites with inoculum from nearby vernal pools to help reestablish populations of San Diego button celery (*Eryngium aristulatum* var. *parishii*), spreading navarretia, California Orcutt grass (*Orcuttia californica*), San Diego fairy shrimp, and Riverside fairy shrimp. Inoculum from the impacted pools at MYF will not be used at the Otay 1-acre parcels site. Required restoration ratios and acreages are presented in Table 10.

Table 10. Required Restoration for Impacts to Vegetation Communities

Vegetation Type	Direct Impacts (acres)*	Restoration Ratio	Required Restoration
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**

*Values may vary slightly due to rounding errors.

BIO-2 Biological Resource Protection

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) section stating that a Project Biologist (Qualified Biologist), as defined in the City'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. 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, Environmentally Sensitive Lands Ordinance, project permit conditions, California Environmental Quality Act (CEQA), 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, 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 Assistant Deputy Director (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 Proposed Action 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, the need to adhere to the provisions of the Federal Endangered Species Act (FESA), and the penalties associated with violating FESA.

F. **Avian Protection Requirements** – To avoid direct impacts to avian species identified as a listed, candidate, sensitive, or special status species in the MSCP, 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 (CSVR). The CSVR 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 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. 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: Vernal Pools

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 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 Proposed Action 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, 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.

7. Grading activities immediately adjacent to vernal pools shall be timed to avoid wet weather to minimize potential impacts (e.g., siltation) to the vernal pools unless the area to be graded is at an elevation below the pools. To achieve this goal, grading adjacent to avoided pools shall comply with the following:

    a. Grading shall occur only when the soil is dry to the touch both at the surface and 1 inch below. A visual check for color differences (i.e., darker soil indicating moisture) in the soil between the surface and 1 inch below indicates whether the soil is dry.

    b. After a rain of greater than 0.2 inch, grading shall occur only after the soil surface has dried sufficiently as described above, and no sooner than 2 days (48 hours) after the rain event ends.

    c. To prevent erosion and siltation from storm water runoff due to unexpected rains, best management practices (i.e., silt fences) shall be implemented as needed during grading.

    d. If rain occurs during grading, work shall stop and resume only after soils are dry, as described above.

    e. Grading shall be done in a manner to prevent runoff from entering preserved vernal pools.

    f. If necessary, water spraying shall be conducted at a level sufficient to control fugitive dust but not to cause runoff into vernal pools.

    g. If mechanized grading is necessary, grading shall be performed in a manner to minimize soil compaction (i.e., use the smallest type of equipment needed to feasibly accomplish the work).

8. Prior to project construction, topsoil shall be salvaged from the impacted vernal pools or road ruts with fairy shrimp on-site consistent with the requirements of the approved restoration plan (e.g., free of versatile fairy shrimp [*Branchinecta lindahli*]). Vernal pool soil (inoculum) shall be collected when dry to avoid damaging or destroying fairy shrimp cysts and plant seeds. Hand tools (i.e., shovels and trowels) shall be used to remove the first 2 inches of soil from the pools. Whenever possible, the trowel shall be used to pry up intact chunks of soil, rather than loosening the soil by raking and shoveling, which can damage the cysts. The soil from each pool shall be stored individually in labeled boxes that are adequately ventilated and kept out of direct sunlight in order to prevent the occurrence of fungus or excessive heating of the soil and stored off-site at an appropriate facility for vernal pool inoculum. Inoculum from different source pools shall not be mixed for seeding any restored pools, unless otherwise approved by the City and Wildlife Agencies. The collected soils shall be spread out and raked into the bottoms of the restored pools. Topsoil and plant materials salvaged from the upland habitat areas to be impacted shall be

transplanted to, and/or used as a seed/cutting source for, the upland habitat restoration/creation areas to the maximum extent practicable as approved by the City.

For this project, vernal pool soil will be collected and provided to the Airport Biologist for storage. The inoculum will not be used at the Otay 1-acre mitigation site for this project. The inoculum will be held by the Airport for use in a future vernal pool restoration project. The inoculum shall be packaged appropriately for long term storage (1 to 2 years).

9. Permanent protective fencing along any interface with developed areas and/or use other measures approved by the City to deter human and pet entrance into on- or off-site habitat shall be installed. Fencing shall be shown on the development plans and should have no gates (accept to allow access for maintenance and monitoring of the biological conservation easement areas) and be designed to prevent intrusion by pets. Signage for the biological conservation easement area shall be posted and maintained at conspicuous locations. The requirement for fencing and/or other preventative measures shall be included in the project's mitigation program.

10. In addition to the mitigation measures listed above, the following project specific mitigation measures shall be implemented to protect vernal pools:

a. **Culvert Inlet Protection** – Prior to the start of any construction work, storm drain inlet protection Best Management Practices (BMPs) shall be installed at the culvert/drainage on the south corner of the building. The BMPs shall be installed to prevent any silt, toxins, or construction debris from entering the drainage and the adjacent vernal pools.

b. **Vehicles and Construction Equipment** – All construction equipment shall be washed/cleaned prior to entering the Proposed Action site and after exiting the Proposed Action site to prevent the spread of invasive species and fairy shrimp cysts.

BIO-4: California Gnatcatcher

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 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 A-weighted 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, 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 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.iii 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.

BIO-5: 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-6: Installation of Barrier

Following completion of all construction work, a barrier shall be installed along both sides of the access road from Ponderosa Avenue 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 northeastern boundary of the Proposed Action 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.

4.2.4 No Action Alternative

Under the No Action Alternative, there would be no vegetation removal or ground disturbance that would impact fish, wildlife, or plants.

The Proposed Action Alternative would result in direct impacts to 0.089 acre of San Diego mesa hardpan vernal pool/San Diego fairy shrimp habitat. The Proposed Action Alternative would also result in indirect impacts to San Diego mesa mint, and coastal California gnatcatcher. By following the measures above, impacts to San Diego mesa hardpan vernal pool, San Diego fairy shrimp, San Diego mesa mint, and coastal California gnatcatcher would be avoided.

4.3 Climate

This analysis incorporates the results of the Air Quality Analysis prepared for the Proposed Action (RECON 2020a) (see Appendix C) as well as AEDT post-processing GHG emissions calculations.

4.3.1 Regulatory Setting

The FAA provides guidance for assessing GHG emissions and determining impacts in the Air Quality Handbook. According to the Air Quality Handbook, there are currently no federal requirements for reporting GHG emissions from aviation sources as well as no significance thresholds. Rather, the information is to be provided for informational purposes as a means of disclosing the Proposed Action's potential effects on GHG emissions and climate change.

4.3.2 Analysis Methodology and Significance Threshold

GHG emissions associated with the Proposed Action would result from construction activities as well as from additional helicopter activities. Construction emissions were calculated using the CalEEMod program which incorporates the most Emission Factors Model (EMFAC) and Off-Road EMFACs. CalEEMod calculates GHG emissions based on fuel consumption from construction and land use projects. GHG emissions associated with MYF and San Diego Fire-Rescue operations were calculated in part using AEDT. As discussed, GHGs include CO_2, nitrous oxide (N_2O), and CH_4. The only GHG emissions calculated by AEDT are CO_2 emissions from aircraft engines. AEDT also calculates total fuel consumption. N_2O emissions were calculated using N_2O emission factors provided in Appendix C of the FAA's Air Quality Handbook. Aircraft engines do not emit CH_4.

GHG emissions are estimated in terms of metric tons carbon dioxide equivalent. As noted by the FAA, CO_2e emissions are the preferred way to assess GHG emissions because they give weight to the global warming potential of different gases.

As described in the regulatory setting above, there are currently no federal requirements for reporting GHG emissions from aviation sources as well as no significance thresholds.

4.3.3 Proposed Action

Direct Impacts

Construction

Construction activities emit GHGs primarily through the combustion of fuels in the engines of off-road construction equipment (primarily diesel) and in the engines of on-road vehicles used for the delivery of materials and the commute vehicles of the construction workers.

GHG emissions associated with construction activities were calculated using CalEEMod as a part of the Air Quality Analysis prepared for the Proposed Action. Based on these calculations, construction of the Proposed Action is anticipated to generate approximately 8 metric tons carbon dioxide equivalent amortized over 30 years as shown in Table 11.

Table 11. Estimated Construction Greenhouse Gas Emissions

Emission Source	CO_2e (metric tons per year)
On-Site Equipment	229
Vendor Trips	11
Worker Commute	9
Total Construction Emissions	**249**
Amortized Over 30 Years	*8*

Source: RECON 2020a

Aircraft Operations

GHG emissions due to MYF and San Diego Fire-Rescue operations in the existing condition, opening year 2022, and year 2027 are summarized in Table 12. Calculation details are provided in the Air Quality Analysis prepared for the Proposed Action.

Table 12. Estimated Aircraft Greenhouse Gas Emissions

Emission Source	CO_2e (metric tons per year)
Existing Year 2020 GHG Emissions	
MYF Emissions	29,496
Proposed Action Emissions	896
Total Emission	30,391
Opening Year 2022 GHG Emissions	
MYF Emissions	29,496
Proposed Action Emissions	1,155
Total Emission	30,650
Year 2027 GHG Emissions	
MYF Emissions	29,496
Proposed Action Emissions	1,474
Total Emission	30,968

Source: RECON 2020a

As described in the regulatory setting above, there are currently no federal requirements for reporting GHG emissions from aviation sources as well as no significance thresholds. Therefore, this information is provided for informational purposes as a means of disclosing the project's potential effects on GHG emissions and climate change and no further analysis at the federal level is required.

Indirect Impacts

The Proposed Action would not create capacity for additional aircraft operations and would have no impact on any other MYF aircraft operations. Therefore, the Proposed Action would not result in any indirect impacts related to GHG.

4.3.4 No Action Alternative

Under the No Action Alternative, no construction activities would occur that would generate any new GHG emissions and the AirOps facility would continue to operate without any hangar space at MYF. Therefore, it would not result in an additional impact related to GHG.

The construction and operational GHG emissions associated with the Proposed Action are summarized in Tables 11 and 12. As described in the paragraph above, the No Action Alternative would not result any new GHG emissions beyond those that would occur under the Proposed Action. As described in the Regulatory Setting section above, there are currently no federal requirements for reporting GHG emissions or significance thresholds. Therefore, this information is provided for informational purposes as a means of disclosing the project's potential effects associated with GHG emissions and climate change and no further analysis is required.

4.4 Hazardous Materials, Solid Waste, and Pollution Prevention

4.4.1 Regulatory Setting

Federal, state, and local laws regulate the transportation, storage, use, and disposal of hazardous materials, solid waste, and pollution. These laws extend to past, present, and future landowners of properties containing hazardous materials. Development or other activities disturbing sites containing hazardous materials may create pathways that allow contaminants to affect human health and the environment.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) establishes liability for those parties responsible for hazardous substance releases to pay cleanup costs and establishes a trust fund to finance cleanup costs in situations in which no responsible party could be identified. CERCLA enables the creation of the National Priority List, a list of sites with known releases or threatened releases of hazardous substances in the United States and its territories used to guide the U.S EPA in determining which sites warrant further investigation. As conditions of a sale, release, or transfer of federal lands or facilities used to store hazardous materials or where a release or disposal of hazardous materials has occurred, federal agencies must identify those lands or facilities, and complete waste or contaminate cleanup of these lands or facilities.

The Oil Pollution Act requires oil storage facilities and vessels (with at least 1,320 gallons in above ground storage containers equal to or greater than 55 gallons each or greater than 42,000 gallons in underground storage tanks) to submit to the EPA plans detailing how the facilities will respond to large oil discharges.

Pollution Prevention Act of 1990 requires pollution prevention and source reduction controls to reduce the effect of these wastes on the environment.

The Resource Conservation and Recovery Act establishes guidelines for hazardous waste and non-hazardous solid waste management activities in the United States. The Resource Conservation and Recovery Act also regulates the generation, storage, treatment, and disposal of waste.

The Toxic Substances Control Act provides the EPA with the authority to regulate the production, importation, use, and disposal of chemicals defined as toxic, including lead, radon, asbestos, and polychlorinated biphenyls, that have the potential to cause unreasonable risk of injury to public health or the environment.

The Hazardous Materials Transportation Act regulates the transportation of hazardous materials to protect human life, property, and the environment from the risks inherent in the transportation of hazardous materials.

Executive Order 12088, *Federal Compliance with Pollution Control Standards* directs federal agencies to comply with applicable pollution control standards in the prevention, control, and abatement of environmental pollution.

Executive Order 12580, Superfund Implementation, delegates to a number of federal departments and agencies the authority and responsibility to implement certain provisions of CERCLA.

Executive Order 13834, *Efficient Federal Operations,* instructs federal agencies to meet statutory requirements that increases efficiency, optimizes performance, eliminates unnecessary use of resources, and protects the environment. This executive order includes implementing waste prevention and recycling measures and complying with federal requirements with regard to solid, hazardous, and toxic waste management and disposal.

The terms "hazardous waste," "hazardous substance," and "hazardous material" are generally associated with industrial wastes, petroleum products, and other contaminants. These terms are described below:

- Hazardous wastes are defined as solid wastes that are ignitable, corrosive, reactive, or toxic. These are also known as "characteristic wastes." The U.S. EPA has deemed certain solid wastes hazardous. These may be referred to as "listed wastes."[1]

- Hazardous substances: Include hazardous waste, hazardous air pollutants, hazardous substances as defined under the CWA and Toxic Substances Control Act, and elements, compounds, mixtures, solutions, or substances listed in 40 CFR Part 302 that pose substantial harm to human health or environmental resources. Hazardous substances do not include any petroleum or natural gas substances and materials pursuant to Comprehensive Environmental Response, Compensation, and Liability Act.

- Hazardous material: Any commercially transported substances or materials that pose unreasonable risk to public health, safety, and property. Hazardous materials include hazardous waste and hazardous substances, as well as petroleum and natural gas materials and substances.[2]

4.4.2 Analysis Methodology and Significance Threshold

As discussed in Section 3.9, a review of the Review of the California DTSC Envirostor Database (DTSC 2020) and SWRCB Geotracker Database (SWRCB 2020) was conducted for the Proposed Action. In accordance with FAA Order 1050.1F, a Proposed Action would have an adverse effect if it were to involve a property on or eligible for the NPL. FAA Order 1050.1F does not establish significance thresholds for pollution prevention or solid waste. In addition, Executive Order 12088, as amended, directs federal agencies to comply with applicable pollution control standards. Construction and demolition waste are required to be disposed of in a manner consistent with local solid waste recycling, collection and disposal regulations, including the County Construction and Demolition Materials Diversion Program, as described in Sections 68.508 through 68.518 of the *San Diego County Code of Regulatory Ordinances.*

4.4.3 Proposed Action

Direct Impacts

Hazardous Materials

As discussed in Section 3.9, review of the California DTSC Envirostor Database (DTSC 2020) and SWRCB Geotracker Database (SWRCB 2020) determined that there are no listed hazardous

[1] 40 CFR Part 261, Subpart C.
[2] 49 CFR Part 172, Table 172.101.

materials sites located on the Proposed Action Site. All DTSC Envirostor Database (DTSC 2020) and SWRCB Geotracker Database (SWRCB 2020) listings within MYF are identified as closed. There are several active hazardous materials sites located within 0.5 mile of the Proposed Action site, but these sites are located outside of the MYF boundary. Construction of the Proposed Action would not affect any of these hazardous material sites outside of the MYF boundary. Helicopter flights associated with operation of the Proposed Action would not affect any of these sites. Additionally, none of these active hazardous materials sites are currently listed on the NPL, nor is it anticipated that they would be eligible for listing on the NPL. Therefore, the Proposed Action would not affect a property on or eligible for the NPL, or any other hazardous materials sites.

Pollution Prevention

The Proposed Action does not contain project elements with a unique or increased potential to cause pollution. As described in Section 41, Air Quality above, the Proposed Action would not generate harmful air quality pollutants and would not result in direct adverse effects. As described in Section 4.3.7 Water Resources below, the Proposed Action would not allow storm water runoff to carry pollutants offsite and would not result in direct adverse effects.

Solid Waste

Construction of the Proposed Action would generate construction waste (e.g., scrap wood, concrete, asphalt). All waste would be disposed of at appropriate landfills or, for inert waste, other appropriate disposal sites in accordance with all local and state regulations and ordinances. Solid waste generated by the Proposed Action would not cause or contribute to a direct adverse effect to solid waste.

Indirect Impacts

Hazardous Materials

The Proposed Action is limited to design and construction of permanent helicopter hangars and support facilities at MYF and would not generate hazardous materials. Therefore, the Proposed Action would not result in any indirect impacts related to hazardous materials.

Pollution Prevention

The Proposed Action does not contain project elements with a unique or increased potential to cause pollution. The Proposed Action would not generate harmful air quality pollutants and storm flows would be accommodated on-site. Therefore, the Proposed Action would not result in any indirect impacts related to pollution prevention.

Solid Waste

The Proposed Action is limited to design and construction of permanent helicopter hangars and support facilities at MYF. The Proposed Action would not generate operational waste (e.g., scrap wood, concrete, asphalt). Therefore, the Proposed Action would not result in any indirect impacts related to solid waste.

4.4.4 No Action Alternative

The No Action Alternative would not involve ground disturbance, introduce any new substances to the Proposed Action site, and/or generate new sources of trash; accordingly, it would not cause or contribute to hazardous materials, pollution, or solid waste impact.

The Proposed Action Alternative would not result in direct adverse effects related to hazardous materials compared to the No Action Alternative.

4.5 Natural Resources and Energy Supply

4.5.1 Regulatory Setting

Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*, establishes an integrated strategy towards sustainability in the federal government and makes reduction of GHG emissions a priority for federal agencies. The Independence and Security Act (P.L. 110-140, 2007) requires federal agencies to take actions to move the United States toward greater energy independence and security, to increase the production of clean renewable fuels, to protect consumers, to increase the efficiency of products, buildings, and vehicles, to promote research on and deploy GHG capture and storage options, and to improve the energy performance of the federal government.

4.5.2 Analysis Methodology and Significance Threshold

FAA order 1050.1F does not establish significance thresholds for energy supply or natural resources. The Order requires the Proposed Action to be examined to identify any proposed major changes that would have a measurable effect on local supplies of energy or natural resources. The Order further states that, “For most actions, changes in energy demands or other natural resource consumption will not result in significant impacts.”

4.5.3 Proposed Action

Direct Impacts

During construction, fuel would be used by construction vehicles and equipment. In addition, electricity provided by San Diego Gas & Electric or diesel fuel would be required to supply power tools on-site during construction. Reclaimed water may be used during construction to control fugitive dust and wash equipment, as available. Asphalt, lumber, and other construction materials derived from natural sources would not be used in unusually large quantities, nor would energy. Although the Proposed Action would support future helicopter flights that would consume fuel, proposed hangars and support facilities would also serve existing AirOps helicopters at MYF and the fire-rescue helicopter flights would occur regardless of the Proposed Action. Therefore, the Proposed Action would not increase demand for energy and natural resources but would accommodate existing and projected AirOps helicopter activities that would occur at MYF independent of whether the Proposed Action were implemented or not. Therefore, there would not be an adverse direct impact to natural resources and the energy supply resulting from the Proposed Action.

Indirect Impacts

Indirect impacts associated with natural resources and energy supply would be limited to maintenance activities that would consume negligible amounts of electricity, natural gas, water, and fossil fuels. Therefore, the Proposed Action would not result in any indirect impacts related to natural resources and energy supply.

4.5.4 No Action Alternative

The No Action Alternative would not change existing conditions at the site or consume resources for construction activities; therefore, it would not result in an effect to natural resources or energy supply.

The Proposed Action Alternative would result in a temporary increase in use of energy and natural resources associated with construction (aggregate, building materials) and there would be no indirect impacts compared to the No Action Alternative. The Proposed Action Alternative impacts would not exceed available or future supplies of these resources.

4.6 Noise and Noise-Compatible Land Use

This analysis incorporates the results of the Noise Analysis prepared for the Proposed Action (RECON 2020b) (see Appendix E).

4.6.1 Regulatory Setting

Policies and procedures for evaluating the environmental impacts associated with airport development are described in FAA Order 1050.1F. The noise analysis related policies and procedures are presented in Appendix B of the Order. These requirements are also included in the *FAA 1050.1F Desk Reference* (FAA 2015), which provides comprehensive guidance regarding the analysis of impacts in specific environmental impact categories.

The determination of significance must be obtained using modeled noise contours along with local land use information and general guidance contained in Appendix A of 14 CFR Part 150. As a means of implementing the Aviation Safety and Noise Abatement Act, the FAA adopted Regulations on Airport Noise Compatibility Planning Programs.

4.6.2 Analysis Methodology and Significance Threshold

Per FAA standards, a significant noise impact would occur if the analysis shows that the Proposed Action would cause noise sensitive areas to experience an increase in noise of CNEL 1.5 dB or more at above CNEL 65 decibel (dB) noise exposure when compared to the baseline condition. For example, an increase from 65.5 dB to 67 dB is considered a significant impact, as is an increase from 63.5 dB to 65 dB.

Construction noise levels were calculated at the airport boundary and at the nearest residential uses. Construction noise is considered a point source and would attenuate at approximately 6 dB(A) for every doubling of distance. Noise contour mapping for MYF and San Diego Fire-Rescue operations were developed using the FAA's AEDT 3b (FAA 2019). AEDT was developed under the auspices of the FAA for use in all FAR Part 150 noise studies and other environmental studies dealing with aircraft noise. The distribution of the noise pattern calculated

by AEDT is a function of the number of aircraft operations during the evaluation period, the types of aircraft flown (i.e., fleet mix), the time of day of the operation, aircraft flight tracks, how frequently each runway is used for operations, and aircraft arrival and departure procedures.

4.6.3 Proposed Action

Direct Impacts

Construction

As shown in Table 13, construction noise levels are not anticipated to exceed 75 dB(A) one-hour equivalent noise level (L_{eq}) at any of the adjacent properties. Although the existing adjacent uses would be exposed to construction noise levels that may be heard above ambient conditions, the exposure would be temporary. Therefore, construction would not permanently cause any noise sensitive areas to experience an increase in noise of CNEL 1.5 dB or more at above CNEL 65 dB noise exposure when compared to the baseline condition.

Table 13. Construction Noise Levels
[dB(A) L_{eq}]

	Total Noise Level at 50 Feet	Noise Level at Airport Boundary	Noise Level at Nearest Residential Uses
Site Preparation/Utilities	84	61	50
Building Construction	85	62	51
Paving	82	59	48

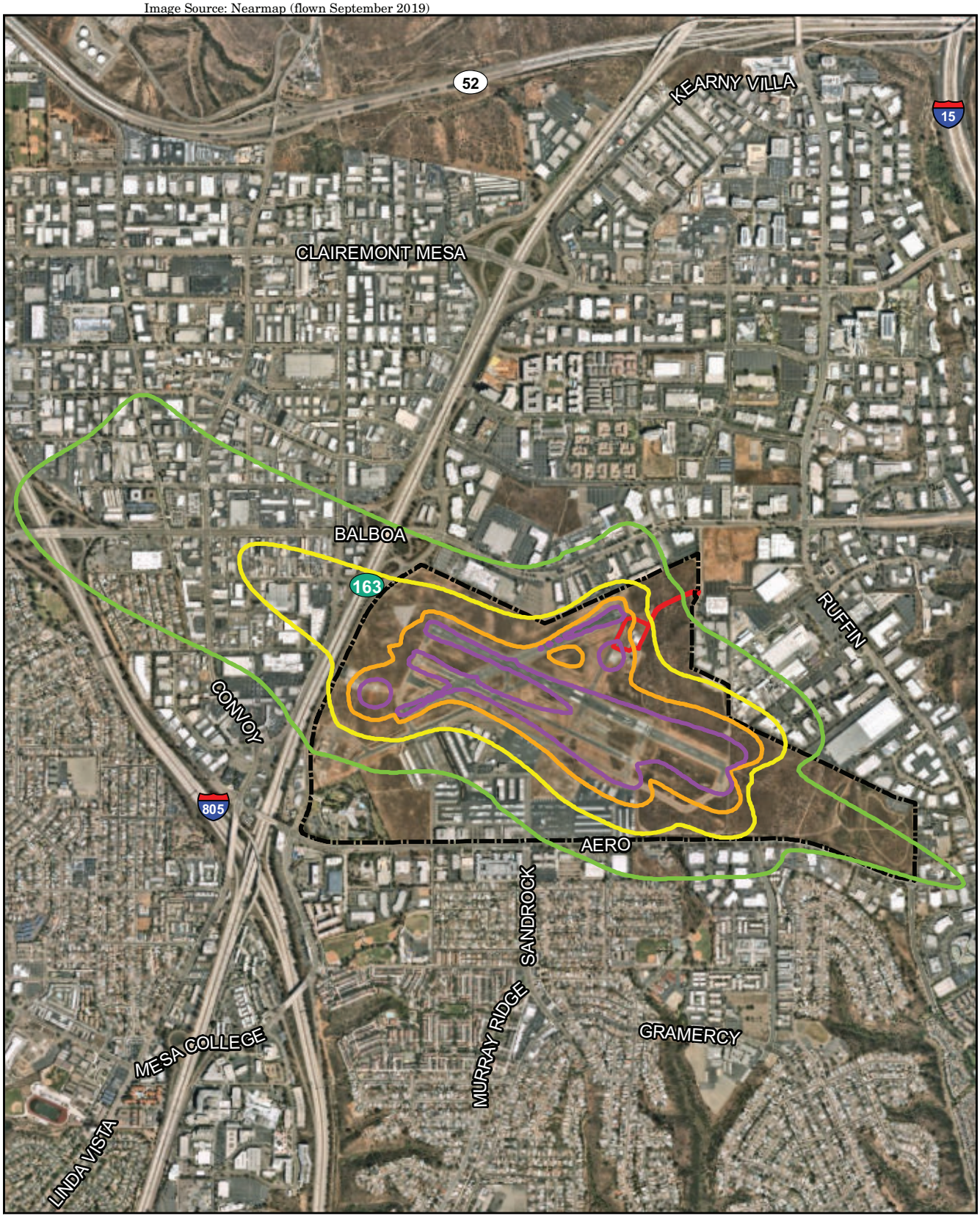
Operation

San Diego Fire-Rescue currently operates three helicopters from MYF consisting of two Bell 412 helicopters and one Lockheed Martin/SikorskyS70i Firehawk helicopter. By the first operational year, an additional Lockheed Martin/SikorskyS70i Firehawk helicopter would be included in the fleet. It was assumed that the final Bell 412 helicopter would be added to the fleet by 2027. Noise contour mapping for MYF and San Diego Fire-Rescue operations were developed using the FAA's Aviation Environmental Design Tool 3b. Noise level contours were developed for the existing condition, opening year 2022, and year 2027.

Noise and land use compatibility standards are established in 14 CFR Part 150, Airport Noise Planning, Land Use Compatibility Guidelines, the Montgomery Field ALUCP, and the City's General Plan. Figure 9 present the Opening Year 2022 Noise Contours and Figure 10 presents the Year 2027 Noise Contours. As shown in Tables 14 through 16, in the existing condition, opening year 2022, and year 2027, the 70 and 75 CNEL noise contours would not extend beyond the airport property. Additionally, no adjacent land uses would be exposed to noise levels greater than 14 CFR Part 150, ALUCP, or General Plan compatibility standards. Therefore, current or future operations would not result in any noise impacts.

This page intentionally left blank

Image Source: Nearmap (flown September 2019)



Project Boundary
Airport Boundary

Noise Contours
60 CNEL
65 CNEL
70 CNEL
75 CNEL

0 Feet 2,000

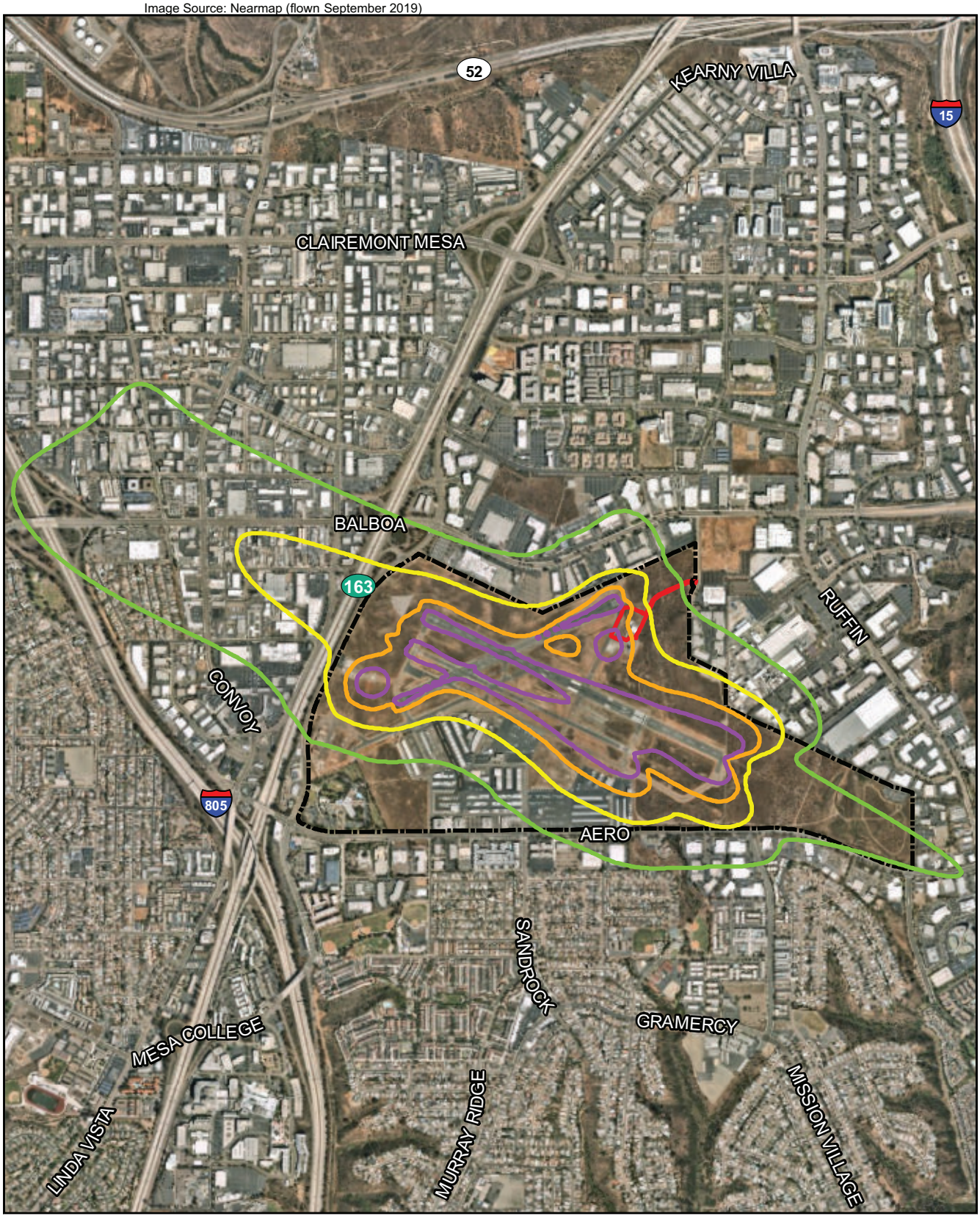
FIGURE 9
Opening Year 2022 Noise Contours

RECON

M:\JOBS5\9078\common_gis\fig9_EA.mxd 12/10/2020 fmm

This page intentionally left blank

Image Source: Nearmap (flown September 2019)



Project Boundary
Airport Boundary

Noise Contours
60 CNEL
65 CNEL
70 CNEL
75 CNEL

0 Feet 2,000

FIGURE 10
Year 2027
Noise Contours

RECON

M:\JOBS5\9078\common_gis\fig10_EA.mxd 12/10/2020 fmm

This page intentionally left blank

Table 14. Existing/No Project Noise Exposure

Land Use	Acres Exposed to:			
	60–65 CNEL	65–70 CNEL	70–75 CNEL	75+ CNEL
Airport Property	442	309	185	80
Residential	13	0	0	0
Commercial Employment, Retail, and Services	105	12	0	0
Industrial Employment	184	23	0	0
Parks, Open Space, and Recreation	8	0	0	0
Roads	125	18	0	0
Total	**878**	**362**	**185**	**80**

Table 15. Opening Year 2022 Noise Exposure

Land Use	Acres Exposed to:			
	60–65 CNEL	65–70 CNEL	70–75 CNEL	75+ CNEL
Airport Property	444	310	186	80
Residential	13	0	0	0
Commercial Employment, Retail, and Services	105	12	0	0
Industrial Employment	188	25	0	0
Parks, Open Space, and Recreation	8	0	0	0
Roads	126	18	0	0
Total	**885**	**365**	**186**	**80**

Table 16. Year 2027 Noise Exposure

Land Use	Acres Exposed to:			
	60–65 CNEL	65–70 CNEL	70–75 CNEL	75+ CNEL
Airport Property	445	311	187	81
Residential	13	0	0	0
Commercial Employment, Retail, and Services	105	12	0	0
Industrial Employment	191	25	0	0
Parks, Open Space, and Recreation	8	0	0	0
Roads	126	18	0	0
Total	**889**	**366**	**187**	**81**

Indirect Impacts

The Proposed Action would not create capacity for additional aircraft operations and would have no impact on any other MYF aircraft operations. Therefore, the Proposed Action would not result in any indirect impacts related to noise.

4.6.4 No Action Alternative

Under the No Action Alternative, no construction activities would occur that would generate noise. Additionally, the AirOps facility would continue to operate without any hangar space at MYF, and the City would still acquire one additional Lockheed Martin/SikorksyS70i Firehawk and one additional Bell 412. Therefore, it would not result in an effect related to noise.

The Proposed Action Alternative would generate construction and operational noise as compared to the No Action Alternative, but these noise increases would not violate any FAA standards.

4.7 Water Resources

As indicated in Chapter 3.0, the Proposed Action site is not within a 100-year floodplain or near a wild and scenic river. Therefore, the Proposed Action would have no impact on floodplains or wild and scenic rivers and do not require further analysis.

4.7.1 Wetlands

4.7.1.1 Regulatory Setting

Executive Order 11990, *Protection of Wetlands* requires federal agencies to "avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative." The stated purpose of this Executive Order is to "minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands." USDOT Order 5660.1A, *Preservation of the Nation's Wetlands* implements the guidelines set forth in Executive Order 11990. Transportation facilities should be planned, constructed, and operated in order to assure the protection and enhancement of wetlands to the fullest extent practicable. The CWA establishes the basic structure for regulating the discharge of pollutants into Waters of the United States, including wetlands, and is administered by the USACE. Section 404 and Section 401 are the two primary sections of the CWA relating to wetland impacts and permitting. Section 404 establishes a program to regulate the discharge of dredged or fill material into Waters of the United States, including wetlands. Section 401 requires a Water Quality Certificate for a project to ensure it does not violate state or tribal water quality standards. Section 401 certifications are generally issued by the state or tribe with jurisdictional authority.

The USACE *Wetland Delineation Manual* defines wetland areas that have positive indicators for hydrophytic vegetation, wetland hydrology, and hydric soils as:

> areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

The USACE typically takes jurisdiction over wetlands only when they lie within or adjacent to navigable waters, or tributaries of such waters where those tributaries bear an ordinary high water mark. An ordinary high water mark is defined as:

> that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in soil character, destruction of terrestrial vegetation, presence of litter or debris, or other appropriate means that consider the characteristics of the surrounding areas.

The Regional Water Quality Control Board (RWQCB) administers the California Porter-Cologne Water Quality Control Act and is responsible for issuance of state water quality certification consistent with the requirements of Section 401 of the CWA. In addition, the CDFW regulates alterations to the flow, bed, channel, or bank of rivers, streams, and lakes pursuant to Sections 1600 et seq. of the California Fish and Game Code.

4.7.1.2 Analysis Methodology and Significance Threshold

The FAA's significance threshold would be exceeded if the Proposed Action would:

- Adversely affect a wetland's function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers;
- Substantially alter the hydrology needed to sustain the affected wetland system's values and functions or those of a wetland to which it is connected;
- Substantially reduce the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare (the term welfare includes cultural, recreational, and scientific resources or property important to the public);
- Adversely affect the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands;
- Promote development of secondary activities or services that would cause the circumstances listed above to occur; or
- Be inconsistent with applicable state wetland strategies.

4.7.1.3 Proposed Action

This impact analysis incorporates the results of the Jurisdictional Waters/Wetland Delineation Report prepared for the Proposed Action (RECON 2019b) (see Appendix F).

Direct Impacts

The Proposed Action would result in direct impacts to vernal pools. A total of 15 vernal pools were mapped in the Survey Area. All 15 vernal pools mapped within the Survey Area, as well as the swale in the southeastern portion of the Survey Area, qualify as USACE jurisdictional waters. The water type for the vernal pools is considered "isolate," as they do not have a distinct connection to any wetland or non-wetland water drainage courses. However, the water type for the ephemeral swale and culvert are considered to be "non-relatively permanent waters" due to their connectivity with an off-site jurisdictional drainage.

There is no other practicable alternative that could further reduce impacts to wetlands. It is necessary that the proposed helicopter hangars and support facilities are located adjacent to the existing San Diego Fire-Rescue Facility. Therefore, it is not feasible to select an alternate location in order to avoid impacts to wetlands. The Proposed Action Alternative is the only alternative that achieves the purpose and need of the project as defined in Chapter 1, and the Proposed Action includes all practicable measures to minimize impacts to wetlands.

Indirect Impacts

The Proposed Action is limited to construction of permanent helicopter hangars and support facilities at MYF. Construction impacts would be confined to the Proposed Action site, and operation would not result in activities that could impact wetlands or non-wetland Waters of the U.S. offsite. Therefore, the Proposed Action would not result in any indirect impacts to wetlands or non-wetland Waters of the U.S. outside the Proposed Action site.

4.7.1.3.1 Mitigation Measures

The Proposed Action would impact six vernal pools that qualify as USACE jurisdictional waters. A pre-construction notification permit application will be submitted and evaluated by the USACE and RWQCB under Sections 404 and 401 of the CWA prior to construction. Mitigation will be analyzed as part of the permit application and verification process. If mitigation is required by jurisdictional agencies, measures will be implemented as special conditions of the verification.

4.7.1.4 No Action Alternative

Under the No Action Alternative, there would be no change to the existing site conditions. Therefore, the No Action Alternative would not result in adverse effects to riparian, aquatic, or wetland habitat, and no impacts to jurisdictional resources would occur.

The Proposed Action Alternative would have permanent impacts to six vernal pools, which qualify as USACE jurisdictional waters, as compared to the No Action Alternative which would avoid all impacts. Adherence to the steps described in Section 4.3.7.1.4 would ensure that impacts USACE jurisdictional waters would be in conformance with CWA requirements.

4.7.2 Surface Waters and Groundwater

4.7.2.1 Regulatory Setting

The Federal Water Pollution Control Act, as amended (commonly referred to as the Clean Water Act or CWA), provides the authority to establish water quality standards, control discharges, and regulate other issues concerning water quality. In accordance with the CWA, the EPA promulgated regulations for permitting storm water discharges, including those from construction activities, through the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program for construction applies to activities that disturb an area of one acre or more. Additionally, construction BMPs and associated plans must conform to the State of California's General Construction Permit. BMPs must be used to meet the NPDES permit requirements for storm water treatment. The main objective is to reduce runoff pollutants from urbanized areas discharging into the San Diego River.

The State Water Resources Control Board develops statewide policy and regulations for water quality control. The agency with local jurisdiction over water quality at the Proposed Action site is

the RWQCB. The RWQCB has adopted the Water Quality Control Plan for San Diego Basin (Basin Plan), which contains specific objectives for the San Diego Hydrologic Unit that encompasses the Proposed Action site. The Basin Plan includes mandates to comply with NPDES requirements and use of BMPs.

4.7.2.2 Analysis Methodology and Significance Threshold

The FAA's significance threshold for surface waters would be exceeded if the Proposed Action would:

- Exceed water quality standards established by federal, state, local, and tribal regulatory agencies; or
- Contaminate public drinking water supply such that public health may be adversely affected.

In addition to the threshold above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider when evaluating the context and intensity of potential environmental impacts for surface waters. Factors to consider that may be applicable to surface waters include, but are not limited to, situations in which the Proposed Action or alternative(s) would have the potential to:

- Adversely affect natural and beneficial water resource values to a degree that substantially diminishes or destroys such values;
- Adversely affect surface waters such that the beneficial uses and values of such waters are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or
- Present difficulties based on water quality impacts when obtaining a permit or authorization.

The FAA's significance threshold for groundwater would be exceeded if the Proposed Action would:

- Exceed groundwater quality standards established by federal, state, local, and tribal regulatory agencies; or
- Contaminate an aquifer used for public water supply such that public health may be adversely affected.

In addition to the threshold above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider when evaluating the context and intensity of potential environmental impacts for groundwater. Factors to consider that may be applicable to groundwater include, but are not limited to, situations in which the Proposed Action or alternative(s) would have the potential to:

- Adversely affect natural and beneficial groundwater values to a degree that substantially diminishes or destroys such values;
- Adversely affect groundwater quantities such that the beneficial uses and values of such groundwater are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or
- Present difficulties based on water quality impacts when obtaining a permit or authorization.

4.7.2.3 Proposed Action

This impact analysis incorporates the results of the SWQMP prepared for the Proposed Action (C&S Companies 2019) (see Appendix G).

Direct Impacts

Construction of the Proposed Action would comply with NPDES permit requirements, including the preparation of and adherence to a Storm Water Pollution Prevention Plan (SWPPP) during construction. The Proposed Action would route all runoff from new impervious areas into a modular wetland for water quality and then into an underground storage system for detention of the 100-year peak volumes. Captured peak runoff volumes from the six-hour, 100-year storm event would be pumped and hauled off for discharge into an acceptable MS4 that meets the requirements of the R9-2013-0001 permit, as amended by R9-2015-0001 and R9-2015-0100, NPDES CAS0109266. Specific requirements for the Proposed Action under this permit would be determined during SWPPP development. The SWPPP shall identify site-specific BMPs to be employed during and post-construction, an implementation schedule, and a monitoring program and reporting requirements to reduce pollutants such as oil and grease, heavy metals, sediments, and trash and debris. Based on compliance with the Construction General Permit and its associated requirements, construction of the Proposed Action would not cause an adverse effect with regard to water quality or storm water pollution. The Proposed Action Alternative would improve site drainage compared to existing conditions and would not cause an operational increase in pollutants that could affect water quality.

Indirect Impacts

A modular wetlands system would capture and treat the overland flow generated by the Proposed Action. Additionally, a storage tank adjacent to the modular wetlands system will capture 100 percent of the six-hour, 100-year storm event from the proposed flows and unimproved tributary flows. The SWQMP prepared for the Proposed Action determine that the post-project storm water conveyance system would have adequate capacity to accommodate future runoff, and that flows would not discharge onto the vernal pools adjacent to the Proposed Action site. Therefore, the Proposed Action would not result in any indirect impacts related to water quality.

4.7.2.4 No Action Alternative

Under the No Action Alternative, there would be no change to the existing drainage patterns or quality of storm water runoff traversing or originating on the Proposed Action site. Therefore, the No Action Alternative would not result in adverse effects to groundwater or surface water quality.

The Proposed Action Alternative would improve site drainage compared to the No Action Alternative and would not cause an operational increase in pollutants that could affect water quality.

4.8 Cumulative Effects

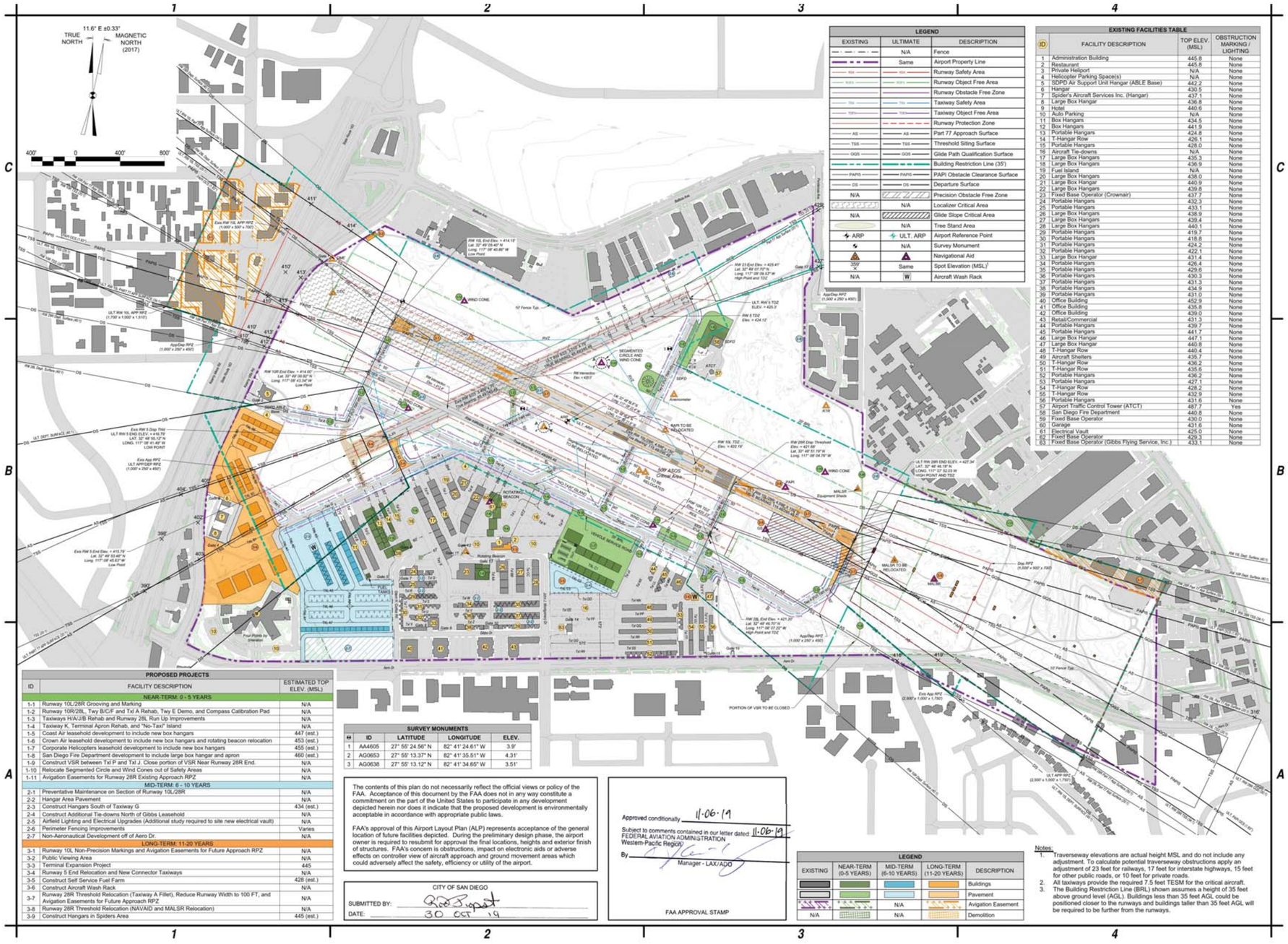
Analysis of the cumulative overall impact of the Proposed Action and the consequences of subsequent related actions is required to determine the significance of potential cumulative impacts on the environment. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time. Cumulative impact analysis considers connected actions, projects related and dependent upon the completion of the proposed airport project. It also considers similar actions or projects having a common geography or timing that provide a basis for considering their impact, together with impacts related to the proposed airport project. For this analysis, cumulative projects are those that that are included in the MYF Airport Master Plan presented in Table 17. The locations of these projects are presented in Figure 11.

Table 17. Cumulative Projects

ID	Facility Description	Estimated Top Elev. (MSL)
Near-Term: 0–5 Years		
1-1	Runway 10L/28R Grooving and Marking	N/A
1-2	Runway 10R/28L, Twy B/C/F and Txl A Rehab, Twy E Demo, and Compass Calibration Pad	N/A
1-3	Taxiways H/A/J/B Rehab and Runway 28L Run Up Improvements	N/A
1-4	Taxiway K, Terminal Apron Rehab, and "No-Taxi" Island	N/A
1-5	Coast Air leasehold development to include new box hangars	447 (est.)
1-6	Crown Air leasehold development to include new box hangars and rotating beacon relocation	453 (est.)
1-7	Corporate Helicopters leasehold development to include new box hangars	455 (est.)
1-8	San Diego Fire Department development to include large box hangar and apron	460 (est.)
1-9	Construct VSR between Txl P and Txl J. Close portion of VSR Near Runway 28R End.	N/A
1-10	Relocate Segmented Circle and Wind Cones out of Safety Areas	N/A
1-11	Avigation Easements for Runway 28R Existing Approach RPZ	N/A
Mid-Term: 6–10 Years		
2-1	Preventative Maintenance on Section of Runway 10L/28R	N/A
2-2	Hangar Area Pavement	N/A
2-3	Construct Hangars South of Taxiway G	434 (est.)
2-4	Construct Additional Tie-downs North of Gibbs Leasehold	N/A
2-5	Airfield Lighting and Electrical Upgrades (Additional study required to site new electrical vault)	N/A
2-6	Perimeter Fencing Improvements	Varies
2-7	Non-Aeronautical Development off of Aero Dr.	N/A
Long-Term: 11–20 Years		
3-1	Runway 10L Non-Precision Markings and Avigation Easements for Future Approach RPZ	N/A
3·2	Public Viewing Area	N/A
3-3	Terminal Expansion Project	445
3·4	Runway 5 End Relocation and New Connector Taxiways	N/A
3-5	Construct Self Service Fuel Farm	428 (est.)
3-6	Construct Aircraft Wash Rack	N/A
3-7	Runway 28R Threshold Relocation (Taxiway A Fillet), Reduce Runway Width to 100 FT. and Avigation Easements for Future Approach RPZ	N/A
3-8	Runway 28R Threshold Relocation (NAVAID and MALSR Relocation)	N/A
3-9	Construct Hangars in Spiders Area	445 (est.)

This page intentionally left blank

Map Source: City of San Diego



RECON

M:\JOBS5\9078\env\graphics\EA\fig11.ai 12/10/20 fmm

FIGURE 11
Cumulative Projects

This page intentionally left blank

Cumulative impacts must evaluate the past, present, and reasonably foreseeable future actions and their cumulative impact on environmental resources. For this analysis, past actions are those known to have occurred within the five years prior to the Proposed Action Alternative implementation. Present actions are those that are ongoing and will continue during the Proposed Action Alternative construction. Reasonably foreseeable actions are those that have: (1) federal, state, or local approval, permits, or funding for implementation; or (2) are programmed into the five-year Airport District Capital Improvement Program.

Specific thresholds for cumulative impacts are not established in FAA Order 1050.1F as the significance threshold varies according to the affected resources. In evaluating cumulative impacts, the impact of the Proposed Action alternative should be added to the impacts of other projects to determine if the significant impact threshold will be exceeded.

4.8.1 Proposed Action

It has been determined through the analysis contained in Chapters 3 and 4 that the following resources are either not present at the Proposed Action site or will not be impacted by the Proposed Action or No Action Alternative. Therefore, no project specific or cumulative impact will occur to these resources: climate, coastal resources; Department of Transportation Act, Section 4(f); farmlands; historical, architectural, archaeological, and cultural resources; land use; natural resources and energy supply; noise and noise-compatible land use; socioeconomics, environmental justice, and children's environmental health and safety risks; and visual effects.

Resource issues that are appropriate for analysis under a cumulative impact assessment are addressed below and include potential impacts to air quality, biological resources, climate, hazardous materials, solid waste, and pollution prevention, and water resources. These categories were identified for cumulative impact analysis because of the potential for impacts related to the Proposed Action.

Air Quality: Section 4.1 of the EA determined that the Proposed Action would not result in any air quality impacts. While other known or foreseeable actions could occur during the same timeframe as the Proposed Action, implementation of appropriate measures during construction of cumulative projects listed in Table 17 would ensure that all air quality emissions from proposed construction activities within the SDAB project region, in combination with any reasonably foreseeable future emission source, would not produce adverse cumulative effects. The AEDT modeling conducted to evaluate operational air quality impacts was cumulative in nature since it considered other aircraft operations at MYF. Therefore, the Proposed Action, in combination with any reasonably foreseeable future projects, would not result in adverse cumulative effects.

Biological Resources: Implementation of avoidance and minimization measures described in Section 4.2 above would minimize and avoid impacts to sensitive species. Cumulative projects listed in Table 17 would also be required to implement mitigation measures, as necessary, to avoid impacts to sensitive species. Therefore, compliance by the Proposed Action and cumulative projects listed in Table 17 with appropriate federal, state, local regulations, and implementation of avoidance and minimization measures as necessary, would prevent cumulative impacts.

Climate: Section 4.3 of the EA determined that the Proposed Action would not result in any climate impacts. Given the related uncertainties involving the assessment of such emissions regionally and globally, the incremental contribution from construction of the Proposed Action on climate

change/greenhouse gases cannot be adequately assessed given the current state of the science and assessment methodology.[3]

Hazardous Materials, Solid Waste, and Pollution Prevention: While other known or foreseeable actions could occur during the same timeframe as the Proposed Action, the Airport Sponsor would: implement project design features; comply with all federal, state, and local hazardous materials regulatory requirements; and implement safety precautions to reduce the risk of accidental releases. Cumulative projects listed in Table 17 would also be required to implement appropriate design features and comply with applicable federal, state, and local hazardous materials regulatory requirements to avoid and minimize impacts. Therefore, the Proposed Action in conjunction with other known or foreseeable actions would not result in a cumulative impact involving hazardous materials, pollution prevention, or solid waste.

Natural Resources and Energy Supply: Construction of the Proposed Action and cumulative projects listed in Table 17 would utilize natural resources and energy such as fuel, electricity, water, asphalt, lumber, and other construction materials derived from natural sources. However, construction of the Proposed Action would not use unusually large quantities, nor volumes of energy or natural resources, and the Proposed Action would not increase operational use of energy or other natural resources at the airfield beyond what is already anticipated in the Airport Master Plan. Due to this relatively small and temporary use of energy or other natural resources, the Proposed Action, in combination with any reasonably foreseeable future projects, would not result in adverse cumulative effects.

Noise: Section 4.6 of the EA determined that construction of the Proposed Action would not result in any noise impacts. Due to the varied schedules for construction of cumulative projects listed in Table 17 and their distances from the Proposed Action site, it is unlikely construction activities would overlap with or result in cumulative increases in noise in conjunction with the Proposed Action, thereby avoiding significant cumulative noise impacts. The noise contours developed to evaluate potential impacts associated with operational noise were cumulative in nature since they considered other aircraft operations at MYF. Therefore, the Proposed Action, in combination with any reasonably foreseeable future projects, would not result in adverse cumulative effects.

Water Resources (Wetlands): As described above in Section 4.7.1 Wetlands, the Proposed Action would result in permanent impacts to Waters of the U.S. that would require review and consultation from the USACE under Section 404 of the CWA. Mitigation will be analyzed as part of the consultation process. If mitigation is required, measures will be implemented as conditions of the project. Cumulative projects listed in Table 17 would also require review and consultation from the USACE and implementation of avoidance, minimization, and mitigation measures as necessary to comply with applicable sections of the CWA. Compliance and implementation of avoidance, minimization, and mitigation measures as necessary by the Proposed Action and cumulative projects listed in Table 17 would minimize cumulative impacts on wetlands.

4.8.2 No Action Alternative

The No Action Alternative would not result in effects on the environment; therefore, it would not be combined or considered in conjunction with other known or foreseeable actions resulting in cumulative effects on the resources addressed in this EA.

[3]NEPA Regulations, CEQ, 40 CFR Section 1502.22, *Incomplete or Unavailable Information.*

5.0 AGENCY AND PUBLIC INVOLVEMENT

5.1 Agency Involvement

Appendix A to this EA includes public notices and agency correspondence associated with the Proposed Action and this EA.

State Historic Preservation Officer

On TBD, the FAA initiated Section 106 Consultation with the State of California, State Historic Preservation Officer (SHPO) in accordance with the National Historic Preservation Act. SHPO concurred with the FAA's determination on TBD. Copies of the correspondence between SHPO and FAA are included in Appendix A. [To be completed once Section 106 is complete.]

Tribal Consultation

RECON submitted a letter to the Native American Heritage Commission (NAHC) on May 22, 2018, and again on May 30, 2019, requesting them to search their files to identify spiritually significant and/or sacred sites or traditional use areas in the Proposed Action vicinity. RECON also requested the NAHC to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the Proposed Action site. RECON received results from the NAHC on June 14, 2019 that were positive and indicated that the Viejas Band of Kumeyaay Indians should be contacted for further information.

The FAA requested input on tribal concerns regarding the Proposed Action site. Appendix A to this EA includes the letter from the NAHC to FAA with the list of the tribal representatives and a sample of the letter sent to the federally recognized tribes. [To be completed once Section 106 is complete.]

On June 14, 2019, the NAHC submitted to FAA a list of tribes culturally affiliated to the Proposed Action site. [To be completed].

Section 7 Consultation

On March 17, 2020, the USFWS completed Section 7 consultation for Proposed Action and determined that the Proposed Action would be consistent with the City's MSCP Subarea Plan and would include all applicable conservation measures in the City's Subarea Plan to avoid and minimize potential adverse effects to the gnatcatcher (USFWS 2020). USFWS also extended the FAA an incidental take exemption for the San Diego and Riverside fairy shrimp already provided to the City through their ITP for their VPHCP. Through Section 7 consultation, USFWS extended to the FAA the incidental take exemption for the San Diego and Riverside fairy shrimp already provided to the City through their incidental take permit for their VPHCP.

5.2 Public Involvement

This Draft EA is being distributed for public review and comment for 30 days, from TBD. A Notice of Availability will be published in the *Daily Transcript* newspaper on TBD.

The City will prepare written response to comments received on the Draft EA and prepare a Final EA for transmittal to FAA for review and approval. The FAA, based on the information contained

in the EA and comments submitted, will make a decision on the Proposed Action and issue a finding. The Final EA and FAA's finding will be available to the public and all who comment on this EA.

6.0 LIST OF PREPARERS

6.1 U.S. Department of Transportation, Federal Aviation Administration

Western-Pacific Region Airports Division
Los Angeles Airports District Office
777 South Aviation Boulevard
El Segundo, California 90245

Gail Campos – Environmental Protection Specialist, FAA Los Angeles Airports District Office: M.S. Biology, B.S. Biology, B.S. Recreation Management. 24 years of experience. Responsible for the FAA review of the environmental assessment; coordination with the California State Historic Preservation Office, and the U.S. Fish and Wildlife Service.

6.2 City of San Diego

Engineering and Capital Projects Department
525 B Street, MS908A, 12th Floor
San Diego, CA 92101

Sean Paver – Senior Planner (Biologist): B.S. Biology. 12 years of experience. Prepared Biological Assessment, oversaw biological surveys, and responsible for City review of the environmental assessment.

6.3 Consultants

RECON Environmental, Inc.
1927 Fifth Avenue
San Diego, CA 92101

Michael Page – Principal: B.A. Environmental Science and Geology/Biology. 29 years of experience. Directed preparation of the EA and technical reports.

Nick Larkin – Senior Project Manager: M.A. Urban Planning, B.A. Urban Studies and Planning. 18 years of experience. Project manager and primary author of the EA.

Carmen Zepeda-Herman – Senior Archaeologist: M.A. Anthropology, B.A. Anthropology. 20 years of experience. Prepared the Historical Resources Survey.

Andrew Smisek – Biologist: B.S. Biology. 5 years of experience. Prepared the Jurisdictional Waters/Wetland Delineation.

Karyl Field – Biologist: M.S. Environmental Engineering, B.A. Marine Science. 10 years of experience. Prepared the Jurisdictional Waters/Wetland Delineation.

Jesse Fleming – Environmental Specialist: B.S. Mathematics. 14 years of experience. Prepared the Air Quality Analysis and Noise Analysis and the climate section of the EA.

Frank McDermott – GIS Coordinator: B.S. Environmental Planning and Design. 20 years of experience. Prepared figures for the EA and technical reports.

This page intentionally left blank

7.0 REFERENCES

Atkins

2017 San Diego Fire Department Hangar Feasibility Study. March 24.

California Air Pollution Control Officers Association (CAPCOA)

2017 California Emissions Estimator model (CalEEMod). User's Guide Version 2016.3.2. October, 2017.

California Air Resources Board (CARB)

2019 California Air Quality Data Statistics. Top 4 Summary and Hourly Listing. Available at http://www.arb.ca.gov/adam/welcome.html. Accessed on August 15, 2019.

California Department of Conservation

2016 California Important Farmland Finder. Available at https://maps.conservation.ca.gov/dlrp/ciff/. Accessed on July 16, 2019.

California Department of Toxic Substances Control (DTSC)

2020 EnviroStor database. Accessed on January 10, 2020.

California State Water Resources Control Board (SWRCB)

2020 GeoTracker database. Accessed on January 10, 2020.

C&S Companies

2019 Storm Water Quality Management Plan (SWQMP), San Diego Fire-Rescue Air Ops Facility. January 25.

RECON Environmental, Inc. (RECON)

2019a Historical Resources Survey for the San Diego Fire-Rescue Air Operations Hangar Project (WBS #B-15012.02.02). December 16.

2019b Jurisdictional Waters/Wetland Delineation for the San Diego Fire- Rescue Air Operations Hangar Project San Diego, California. December 4.

2020a Air Quality Analysis for the San Diego Fire-Rescue Air Operations Hangar Project San Diego, California. January 9.

2020b Noise Analysis for the San Diego Fire-Rescue Air Operations Hangar Project San Diego, California. January 10.

City of San Diego, Engineering and Capital Projects Department

2017 Airport Master Plan, Montgomery-Gibbs Executive Airport, Working Paper 4 – Environmental Overview. Prepared by Atkins. October 2017.

2018 San Diego Municipal Code. Land Development Manual. Biology Guidelines. Adopted September 28, 1999. Amended February.

2019 Revised Final City of San Diego Vernal Pool Habitat Conservation Plan. October.

2020 Biological Resource Report, Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project – Phase II, San Diego, California. July 29.

U.S. Army Corps of Engineers (USACE)

1987 Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, Department of the Army. January.

1997 Regional General Conditions to the Nationwide Permits – Vernal Pool Indicator Species List. Los Angeles District South Pacific Division. November.

2008 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region. September

U.S. Department of Commerce, Bureau of the Census

2018 Census of Population and Housing.

U.S. Environmental Protection Agency (EPA)

2020 National Priorities List (NPL) Sites - by State. Available at https://www.epa.gov/superfund/national-priorities-list-npl-sites-state#CA. Accessed on January 10, 2020.

U.S. Federal Aviation Administration (FAA)

2015 1050.1F Desk Reference.

2019 Aviation Environmental Design Tool 3b.

U.S. Fish and Wildlife Service (USFWS)

2020 Section 7 Consultation for the Montgomery-Gibbs Executive Airport: Fire-Rescue Air Operations Facility Project, City of San Diego, California.

8.0 LIST OF ABBREVIATIONS AND ACRONYMS

$\mu g/m^3$	micrograms per cubic meter
ADD	Assistant Deputy Director
AEDT	Aviation Environmental Design Tool
AirOps	Fire-Rescue Air Operation
ALP	Airport Layout Plan
APE	area of potential effect
Basin Plan	Water Quality Control Plan for San Diego Basin
BCME	Biological Construction Mitigation/Monitoring Exhibit
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
City	City of San Diego
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CSVR	Consultant Site Visit Record
CWA	Clean Water Act (Federal Water Pollution Control Act)
dB	decibels
dB(A)	A-weighted decibel
DTSC	California Department of Toxic Substances Control
EA	Environmental Assessment
EMFAC	Emission Factors Model
ESA	Endangered Species Act
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FACW	facultative wetland
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FSS	Flight Service Station
GHG	greenhouse gas
ITP	incidental take permit
L_{eq}	one-hour equivalent noise level
MBTA	Migratory Bird Treaty Act
MHPA	Multi-Habitat Planning Area
MMC	Mitigation Monitoring Coordination
MMRP	mitigation monitoring and reporting program
MSCP	Multiple Species Conservation Plan
MYF	Montgomery-Gibbs Executive Airport
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NO_2	nitrogen dioxide
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NTP	Notice to Proceed

O_3	oxygen
P.L.	Public Law
PM_{10}	particulate matter with an aerodynamic diameter of 10 microns or less
$PM_{2.5}$	particulate matter with an aerodynamic diameter of 2.5 microns or less
ppm	parts per million
Proposed Action	San Diego Fire-Rescue Air Operations Hangar Project
PUMA	Public Use Microdata Area
RCRA	Resource Conservation and Recovery Act
RECON	RECON Environmental, Inc.
ROFA	Runway Object Free Area
RPZ	Runway Protection Zone
RWQCB	Regional Water Quality Control Board
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SHPO	State Historic Preservation Office
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
U.S. EPA	United States Environmental Protection Agency
U.S.C.	United States Code
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
VOC	volatile organic compounds
VPHCP	Vernal Pool Habitat Conservation Plan

APPENDICES

UNDER SEPARATE COVER

This page intentionally left blank