Section 3.6
Cultural Resources

3.6.1 Introduction

This section analyzes the proposed project's impacts on cultural resources, including impacts from both construction and operational activities. As part of this analysis, the section describes the general approach and methodology, regulatory framework, environmental setting, and significance criteria used to evaluate the proposed project's cultural resource effects. Cultural resources addressed in this section include historic resources; there are no unique archaeological resources or paleontological resources at the project site. An evaluation of tribal cultural resources is provided in Section 3.7, which also includes discussion of tribal consultation completed in accordance with the requirements of Assembly Bill 52.

Comments received in response to the NOP included certain comments related to the evaluation of cultural resources. The San Diego County Archaeological Society, Inc. (SDCAS) acknowledged receipt of the NOP and, while having no specific comments regarding potential cultural resource impacts or issues, requested that they be included in the distribution of the Draft EIR for the proposed project. The Save Our Heritage Organisation (SOHO) indicated that the cultural resources assessment should include the original United Airlines Hangar at SDIA, now known as the ASIG building, due to its historic architectural style. Copies of the NOP comment letters from the SDCAS and SOHO are provided in Appendix R-A.

To provide a technical basis for this impact analysis, Brian F. Smith and Associates, Inc. (BFSA) prepared a comprehensive evaluation of cultural resources at or near the project site and an assessment of the project's potential effects on those resources. That report, which was completed in November 2017, is attached to this EIR as Appendix R-F. The results of the BFSA report are summarized below.

3.6.2 General Approach and Methodology

The following describes the general approach to the cultural resources investigation completed for the proposed project, and the basis for how the specific resources evaluated in the impacts discussion were identified.

To establish the historic resources inventory for the property, an archaeological survey and a records search were conducted with respect to the Area of Potential Effect (APE), which was conservatively defined to include the entire SDIA even though the proposed project would be within only the southern portion of the Airport. A Class I records search of a one-mile radius around the APE was conducted, along with a Class III intensive pedestrian archaeological survey of the APE to identify historic resources that could be affected by the proposed project.

The purpose of the historic resources investigation was to locate and determine the significance of any historic resources that might be affected by the proposed project. This work was conducted pursuant to state and federal guidelines (i.e., in addition to being used for CEQA review of the

proposed project, the investigation information and findings will also be used in conjunction with future review of the proposed project under the National Environmental Policy Act [NEPA]).

The existing structures within the APE were built during various periods of history. For purposes of this EIR, such structures were deemed historic resources if they were 50 years old or older. This age threshold is consistent with CEQA and the National Historic Preservation Act (NHPA).

As described in Chapter 2, Project Description, Section 2.6.8, Project Phasing, implementation of the proposed project would occur in two major phases, each with two subphases, with full buildout anticipated to occur in 2035. Based on the timing of when each of the four subphases of the proposed project are anticipated to occur, the 50-year threshold of potential historic structures was applied in the evaluation as follows:

- Phase 1a: Structures built before 1973 were considered potentially historic;[1]
- Phase 1b: Structures built before 1975 were considered potentially historic;
- Phase 2a: Structures built before 1980 were considered potentially historic; and
- Phase 2b: Structures built before 1984 were considered potentially historic.

As part of this cultural resource investigation, the project archaeologist reviewed archaeological records maintained by the South Coastal Information Center (SCIC) at San Diego State University (SDSU). Through this review, the archaeologist was able to assess previous archaeological studies and identify any previously recorded historic resources within the project boundaries or in the immediate vicinity.

The records review indicated that 25 cultural resource studies have included various portions of the APE, at which 24 historic resources have been recorded within the APE boundaries along with one historic address.

The Class III pedestrian survey conducted for the investigation found that nine historic structures are present within the APE, including three structures determined eligible for listing on the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP).

The aforementioned records review and pedestrian survey found only historic resources to be present within the APE, and no record or evidence of unique archaeological resources being located at or near the project site.

With regard to potential impacts to paleontological resources, the 2008 Environmental Impact Report (EIR) for the SDIA Master Plan noted that the Airport area, which includes the currently proposed project site, is built on what was originally mudflats and bay that was subsequently raised to its current elevation over decades of dredging and placement of fill soils. Based on that,

[1] As originally proposed, Phase 1a would be completed in 2022; therefore, structures built before 1973 were considered potentially historic. Although the completion year for Phase 1a is now anticipated to be 2024, the analysis in the Recirculated Draft EIR is still based upon the assumption that structures built before 1973 are considered potentially historic.

it was concluded that there is no potential for paleontological resources within the SDIA area.[2] As such, no further evaluation of potential impacts to paleontological resources is provided in this section.

3.6.3 Regulatory Framework

3.6.3.1 Federal

National Register

The NHPA established the NRHP (also known as the "National Register") as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."[3] The National Register recognizes properties that are significant at the national, state, and/or local levels. To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The National Register has established four Criteria for Evaluation to determine the significance of a resource:

1. It is associated with events that have made a significant contribution to the broad patterns of our history;

2. It is associated with the lives of persons significant in our past;

3. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

4. It yields, or may be likely to yield, information important in prehistory or history.[4]

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years in age must meet one or more of the above criteria. However, the National Register does not prohibit the consideration of properties less than 50 years in age whose exceptional contribution to the development of American history, architecture, archaeology, engineering, and culture can clearly be demonstrated. In addition to meeting the Criteria for Evaluation, a property must have integrity. "Integrity is the ability of a property to convey its significance."[5] According to National Register Bulletin 15, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.

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[2] San Diego County Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. SCRRAA #EIR-06-01, State Clearinghouse No. 2005091105. April 2008. Section 5.7.3.3.

[3] 36 Code of Federal Regulations, Section 60.2.

[4] 36 Code of Federal Regulations, Section 60.4.

[5] U.S. Department of the Interior, National Park Service. National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation. 1995. p. 44. Available: https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf.

To retain historic integrity, a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.[6]

In assessing a property's integrity, the National Register criteria recognizes that properties change over time; therefore, it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.[7]

NHPA Section 106 Consultation

Section 106 of the NHPA requires federal agencies to take into account the effects of their "undertakings" on historic properties, and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is implemented in ACHP regulations (36 Code of Federal Regulations [CFR] Part 800). The FAA would be required to undertake Section 106 consultation before issuing federal approvals for the proposed project.

3.6.3.2 State

California Environmental Quality Act

According to Section 15064.5(a) of the State CEQA Guidelines (Title 14 CCR, § 15064.5(a)), the term "historical resource" includes the following:

1. A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the CRHR (Pub. Res. Code §§ 5024.1; Title 14 CCR, § 4850 et seq.).

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code (PRC) or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in

[6] U.S. Department of the Interior, National Park Service. National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation. 1995. p. 44. Available: https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf.

[7] "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." U.S. Department of the Interior, National Park Service. National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation. 1995. p. 46. Available: https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf.

light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC SS5024.1, Title 14, Section 4852), including the following:

a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

b) Is associated with the lives of persons important in our past;

c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

d) Has yielded, or may be likely to yield, information important in prehistory or history.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC), or identified in an historical resources survey (meeting the criteria in Section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

According to Section 15064.5(b) of the State CEQA Guidelines, a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

1. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

2. The significance of an historical resource is materially impaired when a project:

a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

c) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of the State CEQA Guidelines applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

1. When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).

2. If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.

3. If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21803.2 of the PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

4. If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study (IS) or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Office of Historic Preservation

The Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also carries out the duties as set forth in the Public Resources Code and maintains the California Historical Resources Information System and the CRHR. The State Historic Preservation Officer (SHPO) is an appointed official, who implements historic preservation programs within the State's jurisdiction. CEQA requires project CEQA documents to identify, analyze, and provide feasible mitigation for substantial adverse impacts that may affect the significance of identified historical resources.

California Register

The CRHR (also known as the “California Register”) was created by Assembly Bill 2881, which was signed into law on September 27, 1992. The California Register is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change." The criteria for eligibility for the California Register are based on National Register criteria. Certain resources are determined by the statute to be automatically included in the California Register, including California properties

formally determined eligible for, or listed in, the National Register. Per OHP's Instructions for Recording Historical Resources, physical evidence of human activities more than 45 years old may be recorded for purposes of inclusion in OHP's filing system although, similar to the National Register, resources less than 45 years old may also be filed.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- California Points of Historical Interest (CPHI) that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Categories 1 through 5; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.

To be eligible for the California Register, an historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:

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

Additionally, an historical resource must retain enough of its historic character or appearance to be recognizable as an historical resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that an historical resource may not retain sufficient

integrity to meet the criteria for listing in the National Register, but may still be eligible for listing in the California Register.[8]

Under CEQA, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."[9] This statutory standard involves a two-part inquiry. The first part is a determination of whether the project involves an historical resource. If it does, the inquiry addresses whether the project may cause a "substantial adverse change in the significance" of the resource. State CEQA Guidelines Section 15064.5 provides that, for the purposes of CEQA compliance, the term "historical resources" shall include the following:

- A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the California Register.
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant for purposes of CEQA unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets one of the criteria for listing on the California Register.
- The fact that a resource is not listed in or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

3.6.3.3 Local

San Diego International Airport Arts Master Plan

SDCRAA recently approved an Arts Master Plan[10] that addresses performing arts, public art, and temporary exhibits. Included in the Arts Master Plan, is the Airport Site and Opportunities Plan to

[8] 14 California Code of Regulations, Chapter 11.5, Section 4852(c). Types of Historical Resources and Criteria for Listing in the California Register of Historical Resources.

[9] California Public Resources Code, Section 21084.1.

[10] Bressi, Todd W., Urban Design • Place Planning • Public Art, Meridith McKinley, Via Partnership, Victoria Plettner–Saunders, WolfBrown. San Diego International Airport Arts Master Plan, Final Draft. Prepared for San Diego County Regional Airport Authority. 2019. Available: http://arts.san.org/2019/03/14/arts-master-plan-2019/.

guide public art and arts infrastructure for the replacement T1. The Site and Opportunities Plan also guides deaccession (official removal) and relocation of artworks from the existing T1 and the airport administration building by providing an inventory and recommendations for the artworks located in the buildings to be removed.

Airport Authority Policy 8.50, which governs the Airport's arts program, outlines the criteria under which deaccession of an artwork in the Public Art Collection would be considered. All artwork being considered for deaccession is evaluated by deliberate, standardized procedures independent of political pressures, fluctuations in artistic taste, and public opinion.

3.6.4 Environmental Setting

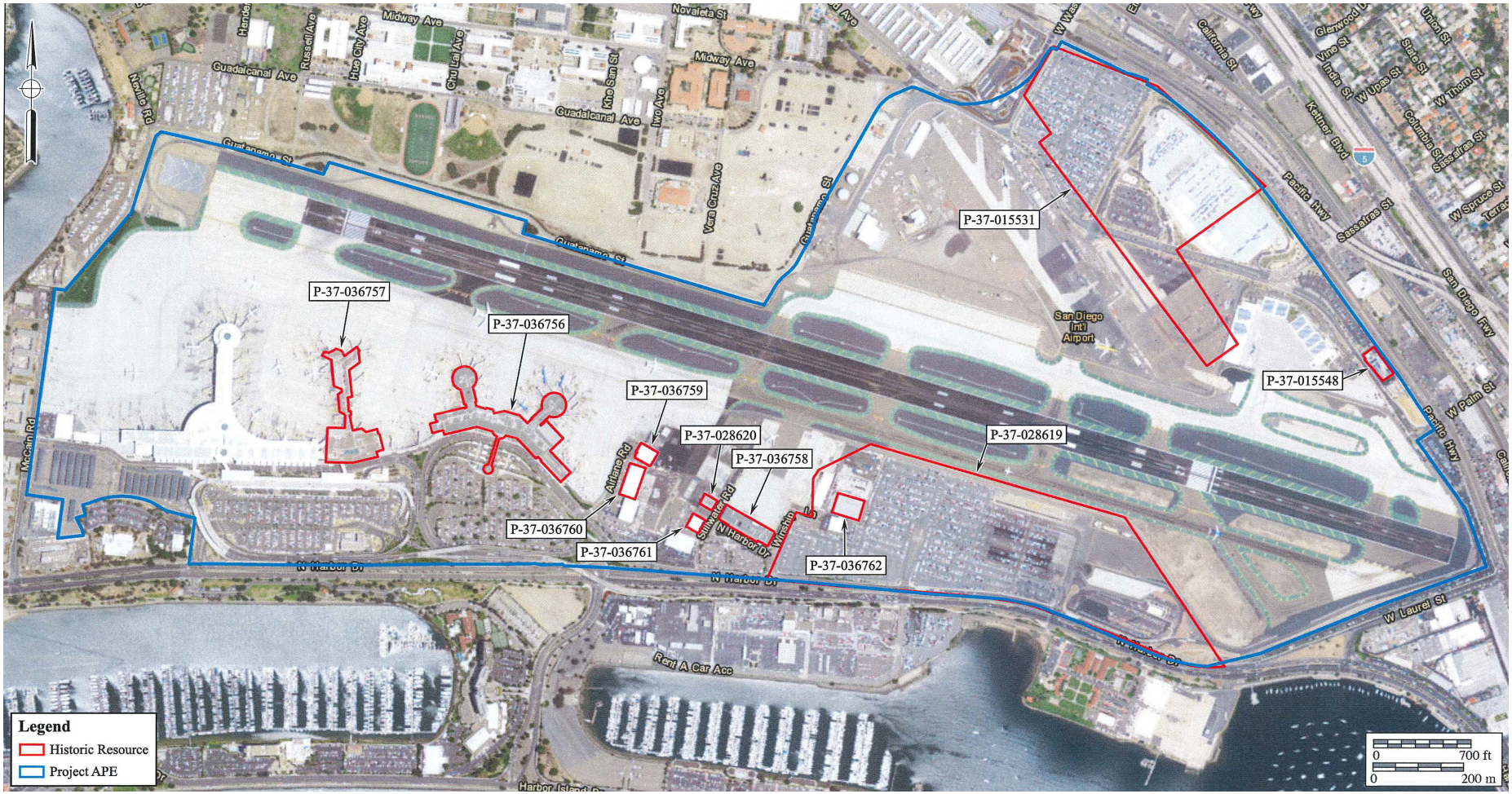
3.6.4.1 Historic Resources

According to the archaeological records search, there are 24 previously recorded archaeological sites located within the APE (Recorded Sites P-37-015531 through P-37-015550, P-37-015552, P-37-015553, P-37-028620, and SDI-18,401), all of which are historic resources. Those sites include:

- 20 historic buildings and one footbridge located within the Consolidated Aircraft Plant No. 1 Historic District;
- The Consolidated Aircraft Plant No. 1 Historic District;
- The United Airlines 1931 hangar and terminal (ASIG Building); and
- The Ryan Aeronautical Company Historic District.

Relative to the completion of a pedestrian survey to check for subsurface archaeological resources within the APE, SDIA is characterized by development, including the construction of modern structures, paved roads, parking lots, runways, and taxiways. Because the land upon which the Airport was constructed was dredged from the bottom of the San Diego Bay, prehistoric features or archaeological deposits were not expected to be encountered. Based on the setting of the site and the results of the archaeological records search, which found only historic resources to have been present within the APE, no unique archaeological resources are considered to exist at the project site.

The pedestrian survey of the APE identified seven unrecorded historic resources and reconfirmed two previously recorded historic resources. Although there were two other historic resource areas formerly located with the APE, they have been demolished and are no longer present. The list of historic resources within the APE is provided in Table 3.6-1. The locations of the resources identified within the APE (and those no longer extant within the APE) are illustrated, based on their site numbers, on Figure 3.6-1.



Source: Brian F. Smith & Associates, 2018.

Figure 3.6-1

San Diego International Airport
Airport Development Plan

HISTORIC RESOURCES LOCATION MAP

September 2019 | Recirculated Draft EIR

Table 3.6-1: Historic Resources Identified Within the Project APE

Site Number	Building Name	Year Constructed
P-37-036756	Terminal 1	1967
P-37-036757	Terminal 2-East	1979
P-37-036758	Pacific Southwest Airlines administrative and maintenance facility (PSA AMF) building	1968
P-37-036759	United Air freight (UAF) building	1968
P-37-036760	Air Support Facilities (ASF) building	1970
P-37-036761	Air Oasis hangar (AOH) building	1962-1964
P-37-028620	United Airlines hangar and terminal (UAHT) building	1931
P-37-036762	Jet engine overhaul (JEO) building	1956-1961
P-37-015548	Convair wind tunnel (CWT) building	1947
P-37-015531	Consolidated Aircraft Plant No. 1 (historic district) – demolished	NA
P-37-028619	Ryan Aeronautical Company Historic District – demolished	NA

Source: Brian F. Smith & Associates, 2017.

The following summarizes the characteristics of each of the nine historic buildings that are present within the APE, including whether it meets the criteria for being designated a significant historic resource. Details regarding the history, characteristics, and significance of each building are presented in the investigation report, which is included as Appendix R-F of this EIR.

The evaluation of each building took into consideration whether it met the criteria for being eligible for listing on the NRHP or the CRHR. Those criteria include the following:

- NRHP/CRHR Criterion A/1: *It is associated with events that have made a significant contribution to the broad patterns of history*.
- NRHP/CRHR Criterion B/2: *It is associated with the lives of persons important in our past.*
- NRHP/CRHR Criterion C/3: *It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values*.
- NRHP/CRHR Criterion D/4: *It has yielded, or may be likely to yield, information important in prehistory or history*.

Site P-37-036756 – Terminal 1

Terminal 1 was constructed in 1967 as a Brutalist-style[11] airport terminal with Futurist influences on the primary (south) façade and International influences on the north, west, and east façades. The overall building currently retains only three out of seven aspects of original integrity, while the primary (south) façade of the main terminal area retains four. Although the modifications made to the north, east, and west façades have negatively impacted the building as a whole, the original primary (south) façade of the main terminal area has remained intact. Currently, the primary

[11] "Brutalist-style" buildings are primarily constructed of concrete and have a design that is strikingly blockish, geometric, and contain design elements with repetitive shapes. See Appendix R-F for additional description of the Brutalist-style.

(south) façade of the main terminal area possesses three out of four Primary and both Secondary character-defining features of Brutalism, which makes this façade a good example of the style. The primary (south) façade of the main terminal area in and of itself is significant under Criterion C/3; however, the loss of architectural integrity on the other three façades has rendered the overall building not significant. Terminal 1 is still reflective of the modernization of Lindbergh Field during the commercial air traffic boom of the 1960s and 1970s and continues to be used as a large volume airport terminal. Therefore, Terminal 1 is significant under NRHP/CRHR Criterion A/1 and, as such, is considered to be a significant historic building for the purposes of this EIR.

Site P-37-036757 – Terminal 2-East

Terminal 2-East was constructed in 1979 as a Brutalist-style airport terminal with Futurist influences on the primary (south) façade of the main terminal area and International influences on the north, west, and east façades. The architectural design was intended to complement the appearance of Terminal 1. Terminal 2-East currently retains only two out of seven aspects of original integrity. Currently, the primary (south) façade of the main terminal area possesses three out of four Primary and both Secondary character-defining features of Brutalism, which makes this façade a good example of the style; however, the removal of the original sky bridge and baggage claim area in 2010 negatively impacted the overall integrity of the building. Although Terminal 2-East is not significant under any NRHP or CRHR criteria, because it was designed as an addition to Terminal 1 utilizing a similar design and materials, it is considered to be a significant historic building for the purposes of this EIR.

Site P-37-036758 – Pacific Southwest Airlines Administrative and Maintenance Facility Building

The PSA AMF building was constructed as a Brutalist-style administrative and maintenance facility in 1968. The building functioned as the San Diego PSA headquarters until the company became a division of USAir in 1987. Although the PSA signage was replaced with USAir signage in 1988, the building itself was not significantly altered until it was repurposed into the Airport's commuter terminal in 1996. Modifications made to the building significantly impacted four of the six character-defining features of Brutalism, which the building previously possessed. Currently, the building only possesses monumental massing and an exposed concrete finish. In addition, the building only retains two (location and setting) out of seven original aspects of integrity. Due to the modifications made to the building since its 1968 to 1987 period of significance, its overall loss of integrity, and its lack of association with any specific significant persons or events, the PSA AMF building is not significant under any NRHP or CRHR criteria and, therefore, it is not considered to be a significant historic building for the purposes of this EIR.

Site P-37-036759 – United Air Freight Building

The International-style UAF building was constructed in 1968. Although the building retains six out of seven aspects of original integrity, it is not a good example of a specific type, method, or period of construction, nor is it representative of the work of a creative individual. Currently, the building possesses only two Primary (lack of applied ornament and asymmetrical façade) and two Secondary (square corners and a concrete and stucco exterior) character-defining features of the International style. In addition, the building is not associated with any significant persons or

events, nor would further study of the building yield any additional information about the International style of architecture or the history of the air freight industry. As such, the UAF building is not significant under any NRHP or CRHR criteria and, therefore, it is not considered to be a significant historic building for the purposes of this EIR.

Site P-37-036760 – Air Support Facilities Building

The ASF building was constructed as an air freight terminal in 1970. Currently, the building retains only two out of seven aspects of original integrity and is not a good example of a specific type, method, or period of construction, nor is it representative of the work of a creative individual. The building possesses only two Primary and one Secondary character-defining features of the International style, which makes it barely representative of this architectural style. In addition, the ASF building is not associated with any significant persons or events, nor would further study yield any additional information about the International style of architecture or the history of the air freight industry. As such, the ASF building is not significant under any NRHP or CRHR criteria and, therefore, it is not considered to be a significant historic building for the purposes of this EIR.

Site P-37-036761 – Air Oasis Hangar Building

The AOH building was constructed as a utilitarian airplane hangar between 1962 and 1964. Although the building retains six out of seven aspects of original integrity, it is not a good example of a specific type, method, or period of construction, nor is it representative of the work of a creative individual. In addition, the building is not associated with any significant persons or events, nor would further study yield any additional information about the building itself or the overall history of airplane storage hangars. As such, the AOH building is not significant under any NRHP or CRHR criteria and, therefore, it is not considered to be a significant historic building for the purposes of this EIR.

Site P-37-028620 – United Airlines Hangar and Terminal Building (*Also known as the ASIG building)*

The UAHT building was originally constructed along Pacific Highway in 1931 as a Spanish Revival/Modernistic-style hangar and terminal for Pacific Air Transport/United Airlines, until it was moved to its current location in 1952. At that time, the building was rotated approximately 180 degrees and the original passenger corridor and terminal were removed, which also removed the majority of the building's Spanish Revival characteristics. The building does, however, retain a curved parapet on what is currently its west façade. Currently, the building only exhibits Modernistic-style elements, such as the square, stepped, concrete, Art Deco-style pillars clad in stucco and the thick, stucco-clad architrave with stepped horizontal grooves at the cornice line.

Despite having been relocated, the UAHT building is still the oldest surviving building within the Airport, and as such, is associated with the "earliest period of development at Lindbergh Field between 1928 and 1933." The UAHT building still meets National Register Criteria Consideration B, which allows moved properties that are significant as a surviving property associated with historic events to be considered eligible for the NRHP. Since the building qualifies for National Register Criteria Consideration B, and is significant under NRHP/CRHR Criterion A/1 for its

association with the early development of Lindbergh Field, it is considered to be a significant historic building for the purposes of this EIR.

Site P-37-036762 – Jet Engine Overhaul Building

The JEO building was constructed as an industrial-style building between 1956 and 1961. Although the building retains four out of seven aspects of original integrity, it is not a good example of a specific type, method, or period of construction, nor is it representative of the work of a creative individual. In addition, the building is not associated with any significant persons or events, nor would further study of the building yield any additional information about the history of Lindbergh Field or the Ryan Aeronautical Company. The JEO building does not meet any of the NRHP/CRHR criteria and, therefore, is not considered to be a significant historic building for the purposes of this EIR.

Site P-37-015548 – Convair Wind Tunnel Building

The CWT building was constructed as a low-speed wind tunnel facility in 1947, and still functions as such. In addition, the building functions as the San Diego Air and Space Technology Center for the San Diego Air and Space Museum. The building retains five out of seven aspects of original integrity and is a good example of a specific type, method, and period of construction (International-style, 1940s, wind tunnel testing facility). The CWT building is significant under NRHP/CRHR Criteria A/1, C/3, and D/4 for its construction as the first low-speed wind tunnel facility in San Diego and its ability to provide further information in the study of aerospace and aviation technology through continued testing. It is, therefore, considered to be a significant historic building for the purposes of this EIR.

3.6.5 Thresholds of Significance

A significant impact on cultural resources would occur if the proposed project would:

Impact 3.6-1 Cause a substantial adverse change in the significance of an historical resource pursuant to State CEQA Guidelines Section 15064.5.

The significance threshold criteria for cultural resources impacts that are identified in Appendix G of the State CEQA Guidelines include: "*Disturb any human remains, including those interred outside formal cemeteries.*" As discussed in Section 3.6.2 above, the Airport area, which includes the currently proposed project site, is built on what was originally mudflats and bay that was subsequently raised to its current elevation over decades of dredging and placement of fill soils. In the unlikely event proposed excavations could impact previously unknown buried human remains, SDCRAA would comply with the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code,[12] and Sections 5097.94(k) and (i) and Sections 5097.98(a) and (b) of the

[12] California Health and Safety Code Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be

Public Resources Code.[13] As such, and as the potential for Native American human remains to be encountered during construction activities is addressed in Section 3.7 of this EIR, this criterion was not evaluated further in this Cultural Resources section of the EIR.

The significance threshold criteria for cultural resources impacts that are identified in Appendix G of the State CEQA Guidelines also include: "*Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5*." As discussed in Section 3.6.2 above, the records review and pedestrian survey conducted for the proposed project found only historic resources to be present, and no record or evidence of unique archaeological resources being located at or near the project site. The significance threshold criteria for geology and soils that are identified in Appendix G of the State CEQA Guidelines related to paleontological resources include: "*Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*"[14] With regard to potential impacts to paleontological resources, the 2008 EIR for the SDIA Master Plan noted that the Airport area, which includes the currently proposed project site, is built on what was originally mudflats and bay that was subsequently raised to its current elevation over decades of dredging and placement of fill soils. Based on that, it was concluded that there is no potential for paleontological resources within the SDIA area.[15] As such, no further evaluation of potential impacts to archaeological and paleontological resources is provided in this section.

3.6.6 Project Impacts

3.6.6.1 Impact 3.6-1

Summary Conclusion for Impact 3.6-1: Implementation of the proposed project would require the demolition and removal of three buildings determined to be significant historic resources. Mitigation is proposed to document the characteristics of each of the three buildings; however, the permanent loss of two of those historic structures would be a *significant and unavoidable impact* of the project, while impacts to the third historic building would be mitigated to a *less than significant impact* by relocating the subject building.

3.6.6.1.1 Construction

As indicated above, there are four buildings that qualify as significant historic sites: (1) Site P-37-036756 (Terminal 1); (2) Site P-37-036757 (Terminal 2-East); (3) Site P-37-028620 (United

those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

[13] Section 5097.98 of the California Public Resources Code stipulates that whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24 hours of their notification by the NAHC. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

[14] This significance threshold related to paleontological resources was previously listed under the category of "Cultural Resources" in Appendix G of the State CEQA Guidelines. Per the December 2018 amendments to the State CEQA Guidelines (subsequent to publication of the Draft ADP EIR in July 2018), this threshold related to paleontological resources was moved from the category of "Cultural Resources" to "Geology and Soils."

[15] San Diego County Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. SCRRAA #EIR-06-01, State Clearinghouse No. 2005091105. April 2008. Section 5.7.3.3.

Airlines Hangar and Terminal Building, a.k.a. the ASIG building); and (4) Site P-37-015548 (Convair Wind Tunnel Building). The proposed project would adversely affect three of these four sites.

Specifically, construction of the new Terminal 1 would require the demolition and removal of the United Airlines Hangar and Terminal Building (a.k.a. the ASIG building) and the existing Terminal 1. These are considered ***significant impacts***. Similarly, construction of the new concourse between the new Terminal 1 and Terminal 2-West would require demolition and removal of Terminal 2-East. This, too, is considered a ***significant impact.***

The Convair Wind Tunnel is situated well away from the proposed ADP improvements areas and would not be impacted by construction of the proposed project.

None of the other five buildings located within the APE that would be demolished and removed as a result of project construction meet the criteria for being a significant historic building. Consequently, impacts to these structures would be less than significant.

Artwork located in the existing T1 and the airport administration building would be deaccessioned or relocated. Consistent with the Arts Master Plan, SDCRAA would work with a qualified professional art conservator to assess which works can be moved without damaging the art, and what is associated with moving, storing, and potentially restoring or retrofitting the work will entail. For the works that can be moved, the program would then have to determine the cost of moving and whether there is an appropriate site for the work.

Based on the above, project construction, and the resultant demolition and removal of three significant historic structures, would result in a ***significant impact***.

3.6.6.1.2 Operations

Operation of the proposed project would not affect any historic resources; consequently, there would be ***no impact.***

3.6.6.1.3 Mitigation Measures

Construction

MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation. An Historic American Buildings Survey (HABS) report has been completed for each of the three significant historic resources that would be impacted by the proposed project; those three resources being (1) the United Airlines Hangar and Terminal Building, (2) the existing Terminal 1, and (3) the existing Terminal 2-East. The three HABS reports are contained in Appendix R-F of the EIR. Each HABS report provides a description and supporting documentation related to the following aspects of each resource:

- Historical Information
  - Physical History
  - Historical Context
- Architectural Information

  - Architectural Character
  - Description of Exterior
  - Description of Interior
  - Site Information (i.e., landscaping)
- Sources of Information
  - Architectural Drawings
  - Photographs

Copies of the three HABS reports will be kept available for public review at the SDCRAA Administrative Office at SDIA. This measure is considered feasible.

MM-HR-2: Relocation of the United Airlines Hangar and Terminal Building (now known as the ASIG Building). Despite having been relocated, the UAHT building is still the oldest surviving building within the Airport and, as such, is associated with the "earliest period of development at Lindbergh Field between 1928 and 1933." The UAHT building still meets National Register Criteria Consideration B, which allows moved properties that are significant as a surviving property associated with historic events to be considered eligible for the NRHP. As such, relocation of the subject building is recommended as mitigation to preserve its historic significance. This measure is considered feasible.

A study was performed to assess the condition of the structure and its compliance with current codes, and to evaluate options for preserving the building. It was determined that it is possible to deconstruct and then re-construct the building at a new location, accounting for the fact that reconstruction of the building would require substantial improvements in order to bring it up to current building code and safety requirements. Two potential relocation sites were identified in the northern portion of SDIA, one location near the northern end of the cargo handling area and the other location at the southeastern edge of the general aviation area, offering the potential for the building to be reused for airport operational purposes or commercial/public use. In addition, the possibility of the subject building being acquired and relocated by a privately-funded entity to a site off-airport was also identified as a potential option. This measure is considered to be ***feasible*** and is, therefore, recommended for implementation.

Relocation of the building to the northern portion of SDIA, with retention of the structure's remaining historic features, will provide compatibility with the orientation, setting, general environment, original character, and use of the historic resource. The relocation under these circumstances will allow the building to retain its eligibility for listing in the National Register and the California Register. Further, retention of the building in its current location is not prudent because it would frustrate Project Objectives to develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction, to optimize the productive use of Airport properties, and to improve ground access to the Airport, and would, therefore, compromise the proposed project to such a degree that it would be unreasonable to proceed with the proposed project in view of its purposes and need. In addition, retention of the

building in its current location is not prudent because it would result in unacceptable safety and operational problems at SDIA. Accordingly, this measure is considered to be ***feasible*** and is, therefore, recommended for implementation.

MM-HR-3: Retention of the Terminal 1 Façade. The primary façade of Terminal 1's original primary (south) façade of the main terminal area has remained intact and possesses three out of four Primary and both Secondary character-defining features of Brutalism. Further, the construction of Terminal 1 is reflective of the modernization of San Diego and its ability to accommodate the ever-increasing needs of the commercial air traffic boom of the 1960s and 1970s. Retention of the façade and incorporation into the design of the replacement Terminal 1 would reduce impacts on historical resources, but it would not reduce impacts associated with demolition of Terminal 1 to less than significant, because only the façade would remain and the structure would no longer be reflective of the past modernization of SDIA. Moreover, retention of the façade is not physically feasible to meet the design and access needs of the Airport. Retention of the existing one story façade would frustrate Project Objectives to optimize the productive use of Airport properties, and to improve ground access to the Airport, because it would not allow for the construction of the new two-level roadway system that separates arrival and departure traffic, helping to ease congestion at the curbfront and improving overall airport circulation and mobility. Consequently, retention of the façade and incorporation into the design of the replacement Terminal 1 would, therefore, compromise the Project to such a degree that it would be unreasonable to proceed with the Project in view of its purposes and need. In addition, retention of the façade and incorporation into the design of the replacement Terminal 1 is not prudent because it would result in unacceptable safety and operational problems at SDIA. Based on the above, this mitigation measure is considered to be infeasible and, therefore, is not recommended for implementation.

Potential Secondary Impacts Associated with Mitigation Measure MM-HR-2

Implementation of Mitigation Measure MM-HR-2 could, in itself, result in impacts to the environment, particularly as related to temporary construction-related impacts. The following describes the types of impacts that could occur, recognizing that if the option of relocating the building to an off-airport site is selected, the nature and extent of several types of impacts would depend on the specific setting of the relocation site. It should be noted that impacts associated with deconstructing the UAHT building have been generally accounted for in the impacts analysis of the proposed project, given that the subject structure would be removed as part of the project.

Aesthetics and Visual Resources: Relocation of the UAHT building to a site in the northern portion of the Airport would not result in significant impacts to aesthetics and visual resources, given that it is a single-story structure of a nature generally similar to and/or compatible with other airport-related structures in that portion of SDIA, and it would not affect public views of scenic resources in the area, including San Diego Bay and the Pacific Ocean, from elevated areas to the east of the Airport.

Air Quality: Reconstruction of the UAHT building would result in short-term air pollutant emissions, which were estimated using the CalEEMod air quality model and are indicated below in Table 3.6-2:

Table 3.6-2: Construction Emissions Associated with Relocation of UAHT Building

	Pollutants (pounds/day)					
	VOCs	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
	19	29	6	4	23	<1
Threshold of Significance	***75***	***250***	***100***	***55***	***550***	***250***
Any Exceedance of Threshold?	No	No	No	No	No	No

Source: CDM Smith, 2019.

Depending on how the relocated building is used, air pollutant emissions associated with its operation could range from no net increase over current emissions, if the building continues to be used for airport operations as it is today, to a net increase if it is repurposed for commercial use. Table 3.6-3 indicates the daily emissions associated with operation of a free-standing commercial/light industry facility devoted to a single use, which were estimated using the CalEEMod air quality model.

Table 3.6-3: Emissions Associated with Commercial Reuse of UAHT Building

	Pollutants (pounds/day)					
	VOCs	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
	19	29	6	4	23	<1
Threshold of Significance	***75***	***250***	***100***	***55***	***550***	***250***
Any Exceedance of Threshold?	No	No	No	No	No	No

Source: CDM Smith, 2019.

As indicated in the tables above, construction and operation of the relocated UAHT building would not result in significant air quality impacts.

Greenhouse Gases and Climate Change: Similar to above, construction and operation of the relocated UAHT building would result in the generation of greenhouse gases (GHGs), which are summarized in Table 3.6-4 below:

Table 3.6-4: GHG Emissions Associated with Construction and Operation of UAHT Building

	GHG Emissions in Metric Tons of CO_2e per Year
Construction Emissions (Amortized over 30 years)	8
Operational Emissions (Commercial Reuse)	116
Total Emissions	124

Source: CDM Smith, 2019.

The generation of GHG associated with construction and operation of the UAHT building would not result in a significant impact on the environment.

Human Health Risk: Based on the size and nature of the UAHT building, its relocation is not expected to result in impacts related to human health risk.

Biological Resources: There are no notable biological resources at or near the potential relocation sites in the northern portion of SDIA. Given that a specific site for the option of relocating the UAHT building to an off-airport location is not known at this time, conclusions regarding the potential for impacts to biological resources cannot be made for that option.

Cultural Resources: Both of the potential relocation sites in the northern portion of SDIA are now, and/or were previously, occupied by airport-related uses. In light of such development, the likelihood of significant archaeological resources being present is considered to be low. Relative to paleontological resources, the subject sites, as well as the Airport area overall, is located on fill soils, which are not considered to contain paleontological resources. Relative to historical resources, the northern portion of SDIA was previously occupied by the Consolidated Aircraft Plant No. 1, but that historic district is no longer present. Moreover, there are no existing buildings at either of the relocation sites. As such, and in light of the fact that the purpose of relocating the UAHT building is to avoid the loss of a significant historic resource, relocation of the UAHT building to either of those sites would not result in a significant impact to a historic resource. With regard to potential option of relocating the UAHT building to an off-airport location, a specific site for such relocation, if pursued, has not been identified; therefore no conclusion regarding historic resource impacts under that option can be drawn at this time, other than the fact that relocating the UAHT building serves as mitigation of impacts to that significant historic resource.

Tribal Cultural Resources: As noted in Section 3.7.2, a Sacred Lands File records search of the Area of Potential Effects (APE), which encompasses the entirety of SDIA, found no record of such lands at the Airport. No known tribal cultural resources have been identified at SDIA. Additionally, grading associated with relocation of the UAHT building to either of the potential sites in the northern portion of SDIA would involve only shallow grading, which would likely extend only into previously disturbed fill materials. Based on the above, no significant impacts to tribal cultural resources are anticipated to occur from such relocation. Similar to other issues above, it is not possible to draw such a conclusion regarding tribal cultural resources associated with the potential option for relocating the UAHT building to an off-airport site, because a specific site has not been identified.

Geology and Soils: Based on Figure 3.8-1 Geology and Local Fault Map presented in Section 3.8, there are no known active faults at or near either of the two potential relocation sites in the northern portion of SDIA. Based on other information presented in Section 3.8, there do not appear to be any notable geology and soil conditions in the northern portion of SDIA that would cause on-airport relocation of the UAHT building to result in significant impacts, recognizing that the development of detailed engineering and construction plans for the building relocation would address site-specific geotechnical conditions. It should be noted that relocation of the UAHT building would require that the building be brought up to current building code and safety standards, which would represent an improvement over existing conditions. Unless and until a specific site is selected for the off-airport relocation option, if pursued, it is not possible to assess the potential for local presence of active faults or other site-specific geotechnical conditions under that option. Notwithstanding, reconstruction of the UAHT building at an off-airport location would still need to meet current building code and safety requirements.

Hazards and Hazardous Materials: As identified in Section 3.9, Hazards and Hazardous Material, as a result of past uses at the Airport and surrounding properties, soil and groundwater contamination has occurred. While remediation activities have occurred, there is the potential that some soil and groundwater contamination associated with past activities could remain at concentrations above regulatory screening levels. Specifically, in the northern portion of SDIA, there are several reported closed cases of leaking underground storage tanks (LUST). Additionally, a public records search of government databases that was performed electronically by Environmental Data Resources, Inc. (EDR) identified a potential toxic pit site at a former firefighting test area in the northern portion of SDIA that is listed on the Toxic Pits Cleanup Act Sites database, which identifies sites suspected of containing hazardous substances where cleanup has not yet been completed.[16] Further, previous site investigations at the southeastern edge of the general aviation area have identified volatile organic compound (VOC) and total petroleum hydrocarbon (TPH)-impacted soil.[17] While some removal of these soils occurred during past demolition activities at the site, the potential remains that some soil and groundwater contamination could remain at concentrations above regulatory screening levels. As described in Section 3.9, should contaminated soil and groundwater be encountered at the relocation site, it would be remediated and/or removed during relocation/construction under stringent oversight by federal, state, county, and city agencies in accordance with applicable regulations, as identified in Section 3.9.3. Further, compliance with worker safety would be protected by adherence to requirements set forth in Occupational Safety and Health Administration (OSHA) and California Division of Occupational Safety and Health (CalOSHA). Additionally, Mitigation Measure MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP) would be applied to the relocation of the UAHT building.

The existing UAHT building is known to contain asbestos containing materials (ACM) and lead-based paint (LBP). Implementation of Mitigation Measure MM-HW-3: Hazardous Building Materials Abatement would address that issue in conjunction with relocation of the building.

Similar to other issues above, it is not possible to draw such conclusions regarding hazards and hazardous materials associated with the potential option for relocating the UAHT building to an off-airport site, because a specific site has not been identified.

Hydrology and Water Quality: Of the two potential relocation sites in the northern portion of SDIA, one is fully paved and used for airport operations and the other that was formerly used for general aviation (i.e., hangar, offices, and parking lot), which was demolished in late 2014 and is now vacant and unpaved. Relocation of the UAHT building to either of these sites would not result in a substantial change in existing hydrology or water quality, although return of the vacant site to a paved condition would reduce the current potential for erosion and sedimentation associated with stormwater runoff. Relocation of the UAHT building to either site would be subject to the new development/redevelopment requirements of the MS4 Permit and BMP Design Manual of the SDIA Storm Water Management Plan, and construction activities would be subject to the requirements

[16] Amec Foster Wheeler Environment and Infrastructure, Inc. Final Phase I Environmental Site Assessment: Project Area 2 – Southside T1RP and Support Facilities, San Diego International Airport, San Diego, California. July 26, 2017.

[17] Kleinfelder. Environmental Monitoring Summary Report Fixed Base Operator Facility Demolition, San Diego International Airport, San Diego, California. Kleinfelder Project No. 20150945.001A. December 1. 2015.

of the State Construction General Permit, all of which is discussed in Section 3.10, Hydrology and Water Quality. Based on the above, no significant hydrology or water quality impacts are anticipated to occur from relocation of the UAHT building to either of the potential on-airport locations.

Neither of the two potential relocation sites are located in a flood zone.

Similar to other issues above, it is not possible to draw specific conclusions regarding hydrology and water quality impacts under the potential option for relocating the UAHT building to an off-airport site, because a specific site has not been identified. It can, however, be anticipated that relocation to an off-airport site would still be subject to state and local requirements related to the MS4 Permit and the State Construction General Permit.

Land Use and Planning: The UAHT building falls within the SDIA land use category of Airport Support. One of the two potential on-airport relocation sites is located within an area specifically designated for such uses in the Airport Land Use Plan that is presented in Figure 3.11-1 in Section 3.11, Land Use and Planning. Although the other relocation site is within an area designated for Ground Transportation uses, it would be within the portion of the existing cargo complex that is also situated within that Ground Transportation land use designation and, from a land use perspective, whether the building is used for aviation or commercial purposes, it would be compatible with the surrounding uses. The inconsistency with the land use designation is not considered to be a significant impact.

As discussed in Section 3.11, the existing aviation and aviation supporting uses at SDIA are consistent with the California Tidelands Trust and are consistent with the uses allowed in the tidal and submerged lands under the San Diego Unified Port District Act. Continuing to use the relocated building as an aviation-supporting use would remain consistent with the California Tidelands Trust and San Diego Unified Port District Act. The relocated building could also potentially operate with a commercial use, possibly including a public-serving use such as an educational/exhibit space. Commercial and public uses would also be consistent with the California Tidelands Trust and San Diego Unified Port District Act.

Relocation of the building to either potential relocation site in the northern portion of SDIA would also be consistent with the California Coastal Act. The sites are located on SDIA property and the relocation would not prevent or obstruct public access to coast, nor would the relocation result in other conflicts with the Chapter 3, Coastal Resources Planning and Management Policies and the Environmental Justice Policy of the California Coastal Act.

Similar to other issues above, it is not possible to draw specific conclusions regarding land use and planning impacts under the potential option for relocating the UAHT building to an off-airport site, because a specific site and use for the building have not been identified.

Noise: Noise impacts associated with relocation of the UAHT building are generally expected to be limited to construction-related noise; however, since a specific type of reuse of the relocated building has not yet been determined, the potential for operations-related noise impacts cannot be completely dismissed at this time. Regardless, there are no noise-sensitive receptors at or near the

potential relocation sites in the northern portion of SDIA; consequently, no significant noise impacts are expected to occur relative to relocation of the building to either of those sites.

Given that a specific site for the option of relocating the UAHT building to an off-airport location is not known at this time, conclusions regarding the potential for construction-related noise to impact nearby noise-sensitive receptors cannot be made for that option.

Public Services: Relocation of the UAHT building to either of the potential on-airport sites would be served by the same public services entities that currently serve the UAHT building at its current location and also currently serve the areas, where it may be relocated to. Such entities include the City of San Diego Police Department, San Diego Harbor Police Department, and City of San Diego Fire-Rescue Department and, by extension through mutual aid agreements, other local emergency services agencies. Based on the size and nature of the UAHT building, it is not anticipated that its relocation to either of the potential on-airport sites would affect existing emergency response services and require the need for new or physically altered governmental facilities; no significant impacts are expected.

Neither of the potential on-airport relocation sites are near, or would affect, any parks.

Similar to other issues above, it is not possible to draw specific conclusions regarding public services impacts under the potential option for relocating the UAHT building to an off-airport site, because a specific site and use for the building have not been identified.

Traffic and Circulation: Reconstruction of the UAHT building at any one of the potential relocation sites would result in temporary construction-related traffic impacts on nearby streets. Relative to the two potential on-airport sites, the main streets nearby that would be most affected would include Pacific Highway and Washington Street. As indicated in Table 3.14-6 in Section 3.14, Traffic and Circulation, segments along those roads currently operate at Levels of Service (LOS) C or better and, as indicated in Table 3.14-5, most intersections in that general area currently operate at LOS C or better. Construction-related traffic to and from the potential relocation sites is not expected to significantly affect those streets. As discussed in Section 3.14, Traffic and Circulation, Section 3.14.6.5.1 regarding construction traffic impacts projected to occur in Phase 1a, which is when relocation of the UAHT building would likely occur, temporary significant impacts are anticipated to occur at the intersection of Laurel Street at Kettner Boulevard during the AM and PM peak hour, and at the intersection of Kettner Boulevard at Palm Street during the AM and PM peak hour. Those impacts can, however, be reduced to a less than significant level with project mitigation. Demolition of the UAHT building was included as part of the construction activities, and associated construction traffic, in Phase 1a, which would generally cover the construction traffic otherwise associated with deconstruction of the UAHT building. Reconstruction of the UAHT building at either of the two potential relocation sites in the northern portion of SDIA would generate construction traffic that was not accounted for in the Phase 1a impacts analysis; however, given the size and nature of the building, its reconstruction is not anticipated to generate a large volume of construction traffic, plus the locations of those sites are closer to street segments and intersections that generally operate at acceptable levels of service (i.e., LOS C or better). Based on the above, no significant construction traffic impacts are expected to result from relocation of the UAHT building to either of the two potential on-airport sites.

Relative to operational traffic impacts, it is not expected that operation of the UAHT building at either of the two potential on-airport sites would generate substantial traffic, based on the size and nature of the subject facility. No significant operational traffic impacts are expected to occur.

Similar to other issues above, it is not possible to draw specific conclusions regarding traffic impacts associated with the potential option for relocating the UAHT building to an off-airport site, given that a specific site and use for the building have not been identified.

Utilities: Relocation of the UAHT building would include connections to standard utilities such as potable water, sanitary sewer, electricity, telecommunications, and storm water drainage. Both of the potential on-airport relocation sites are near other existing on-airport development having such utilities, which should help facilitate making those utility connections. It is not possible to draw such conclusions regarding utilities connections associated with the potential option for relocating the UAHT building to an off-airport site, given that a specific location has not been identified.

The relocation and reuse of the UAHT building is not anticipated to result in a substantial increase in demands on those utilities, as well as demands on solid waste disposal, compared to existing demands associated with current use of the subject facility. Although the potential for commercial reuse of the UAHT building at its new location would be a higher intensity use than the current use, it is anticipated that the potential for greater demands on utilities would be partially offset by the more strict energy and water conservation measures set forth in current building code requirements that would apply to reconstruction of the building. Specifically, the relocated building would incorporate the State Building Energy Efficiency Standards (CCR Title 24 Part 6) for features such as lighting and heating and cooling. Replacement of existing features, including windows that are currently inefficient and inconsistent with current design and energy standards, would be considered provided that the architectural style can be maintained. This would result in efficiency improvements in energy use compared to the existing building and the relocation would not result in wasteful, inefficient, or unnecessary consumption of energy. As such, no significant impacts related to utility demands are expected to result.

Operations

No mitigation is required for operations.

3.6.6.1.4 Significance of Impact After Mitigation

Under State CEQA Guidelines Section 15126.4(b)(1), treatment of historical resources consistent with the U.S. Secretary of the Interior's Standards is generally considered sufficient to mitigate impacts to less than significant levels. However, State CEQA Guidelines Section 15126.4(b(2) states that, in some cases, documentation of an historical resource by way of historical narrative, photography, etc., may not be enough to mitigate the effects to less-than-significant levels caused by the demolition of an historical resource. Such is the case with the currently proposed project. While implementation of Mitigation Measure MM-HR-1 would provide for comprehensive documentation to memorialize the history and characteristics of the three significant historic buildings that would be demolished and removed for the proposed project, the permanent loss of two of those buildings, specifically, the Terminal 1 building and the Terminal 2-East building, would remain a ***significant and unavoidable impact*** after mitigation. With the combination of

Mitigation Measures MM-HR-1 and MM-HR-2, the impacts to the UAHT building would be reduced to a ***less than significant impact.***

3.6.7 Summary of Impact Determinations

Table 3.6-5 summarizes the impact determinations of the proposed project related to cultural resources, as described above in the detailed discussion in Section 3.6.6. Identified potential impacts are based on the significance criteria presented in Section 3.6.5, the information and data sources cited throughout Section 3.6, and the professional judgment of the report preparers, as applicable.

Table 3.6-5: Summary Matrix of Potential Impacts and Mitigation Measures Associated with the Proposed Project Related to Cultural Resources

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
Impact 3.6-1: Implementation of the proposed project would require the demolition and removal of three buildings determined to be significant historic resources. Mitigation is proposed to document the characteristics of each of the three buildings; however, the permanent loss of two of those historic structures would be a *significant and unavoidable impact* of the project, while impacts to the third historic building would be mitigated to a *less than significant impact* by relocating the subject building.	Construction: Significant Impact Operation: No Impact	MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation MM-HR-2: Relocation of the United Airlines Hangar and Terminal Building (now known as the ASIG Building).	Construction: Significant and Unavoidable for two of the buildings. Less than significant for one building Operation: No Impact

3.6.7.1 Mitigation Measures

MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation. An Historic American Buildings Survey (HABS) report has been completed for each of the three significant historic resources that would be impacted by the proposed project; those three resources being (1) the United Airlines Hangar and Terminal Building, (2) the existing Terminal 1, and (3) the existing Terminal 2-East. The three HABS reports are contained in Appendix R-F of the EIR. Each HABS report provides a description and supporting documentation related to the following aspects of each resource:

- Historical Information
  - Physical History
  - Historical Context
- Architectural Information
  - Architectural Character
  - Description of Exterior

  - Description of Interior
  - Site Information (i.e., landscaping)
- Sources of Information
  - Architectural Drawings
  - Photographs

Copies of the three HABS reports will be kept available for public review at the SDCRAA Administrative Office at SDIA. This measure is considered feasible.

MM-HR-2: Relocation of the United Airlines Hangar and Terminal Building (now known as the ASIG Building): Despite having been relocated, the UAHT building is still the oldest surviving building within the Airport and, as such, is associated with the "earliest period of development at Lindbergh Field between 1928 and 1933." The UAHT building still meets National Register Criteria Consideration B, which allows moved properties that are significant as a surviving property associated with historic events to be considered eligible for the NRHP. As such, relocation of the subject building is recommended as mitigation to preserve its historic significance. This measure is considered feasible.

MM-HR-3: Retention of the Terminal 1 Façade. The primary façade of Terminal 1's original primary (south) façade of the main terminal area has remained intact and possesses three out of four Primary and both Secondary character-defining features of Brutalism. Further, the construction of Terminal 1 is reflective of the modernization of San Diego and its ability to accommodate the ever-increasing needs of the commercial air traffic boom of the 1960s and 1970s. Retention of the façade and incorporation into the design of the replacement Terminal 1 would reduce impacts on historical resources, but it would not reduce impacts associated with demolition of Terminal 1 to less than significant, because only the façade would remain and the structure would no longer be reflective of the past modernization of SDIA. Moreover, retention of the façade is not physically feasible to meet the design and access needs of the Airport. Retention of the existing one story façade would frustrate Project Objectives to optimize the productive use of Airport properties, and to improve ground access to the Airport, because it would not allow for the construction of the new two-level roadway system that separates arrival and departure traffic, helping to ease congestion at the curbfront and improving overall airport circulation and mobility. Consequently, retention of the façade and incorporation into the design of the replacement Terminal 1 would, therefore, compromise the Project to such a degree that it would be unreasonable to proceed with the Project in view of its purposes and need. In addition, retention of the façade and incorporation into the design of the replacement Terminal 1 is not prudent because it would result in unacceptable safety and operational problems at SDIA. Based on the above, this mitigation measure is considered to be infeasible and, therefore, is not recommended for implementation.

3.6.8 Significant Unavoidable Impacts

The permanent loss of two of the three significant historic buildings would be a ***significant and unavoidable impact*** to cultural resources associated with construction of the proposed project.

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