

DRAFT  
ENVIRONMENTAL IMPACT REPORT

SDCRAA # EIR-19-01  
State Clearinghouse No. 2018111052

ADDITIONAL FUEL TANKS PROJECT  

---

SAN DIEGO INTERNATIONAL AIRPORT

SAN DIEGO  
COUNTY  
REGIONAL  
AIRPORT  
AUTHORITY

Lead Agency:  
SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY  
P.O. Box 82776  
San Diego, CA 92138-2776  
[www.san.org](http://www.san.org)

NOVEMBER 2019

**NOTICE OF AVAILABILITY**  
**DRAFT ENVIRONMENTAL IMPACT REPORT**  
SAN DIEGO INTERNATIONAL AIRPORT – ADDITIONAL FUEL TANKS  
SCH NO. 2018111052 – SDCRAA #EIR-19-01

Pursuant to the California Environmental Quality Act (CEQA), the San Diego County Regional Airport Authority (SDCRAA or Authority), as the Lead Agency, has prepared a Draft Environmental Impact Report (EIR) for additional aviation fuel storage tanks at San Diego International Airport (SDIA or Airport). The Additional Fuel Tanks Project (proposed Project) would not result in any significant and unavoidable impacts during construction and/or operation of the Project. The analysis in the Draft EIR determined that impacts related to aesthetics and biological resources would be less than significant, and impacts related to hazards and hazardous materials would be less than significant with mitigation.

**PROJECT LOCATION:** SDIA is located in the northwest portion of the downtown area within the City of San Diego. The Airport is generally bounded by North Harbor Drive and San Diego Bay to the south, the Navy Boat Channel and Liberty Station mixed-use development to the west, the Marine Corps Recruit Depot to the north, and Pacific Highway and Interstate 5 to the east.

**PROJECT DESCRIPTION:** The existing fuel farm at SDIA, constructed in the early 1990s, is located in the northeast corner of the Airport property, north of Runway 9-27 and the Aircraft Rescue and Fire Fighting facility, east of Marine Corps Recruit Depot – San Diego, and west of W. Washington Street and the Airport Traffic Control Tower. The existing fuel farm contains two 1-million-gallon aviation fuel tanks and is supplied by regional refineries via the existing Airport fuel delivery pipeline. Any lapse or shortage in fuel delivery, as well as inspection and maintenance activities of on- or off-Airport fuel pipelines or the fuel farm systems, requires fuel to be delivered to the Airport via tanker truck, which results in substantially slower and less reliable replenishment of the fuel farm supply. Since the construction of the existing fuel farm, aircraft operations and passenger enplanements have increased through the use of larger aircraft and additional scheduled operations. In July 2018, the peak aviation activity month, the fuel farm could accommodate approximately two days of fuel. The existing fuel reserve capacity is well below industry standard for airports similar to SDIA (a 5- to 7-day supply of fuel), making SDIA operations susceptible to inadequate fuel supply during pipeline malfunctions and impeding facility maintenance.

The proposed Project would increase the capacity of the Airport's fuel storage facilities to accommodate an industry standard of 6 days of peak-period fuel demand reserves by constructing three 1,146,320-gallon (shell volume) fuel tanks, with a usable storage capacity of approximately 966,000 gallons each, adjacent to the existing fuel farm. The proposed cylindrical tanks would be approximately 58 feet high and 58 feet in diameter. Containment dike walls approximately 1 foot in width and 6 feet in height would be constructed on the east, west, and south periphery of the proposed tanks. The proposed containment dike walls would be connected to the fuel farm's existing containment dike walls to create an expanded containment area. Secondary containment dike walls would also be constructed between the proposed tanks and the primary dike wall. The secondary containment dike walls would be approximately 8 inches thick and 3 feet above grade. Upon completion, containment capacity for the fuel farm would exceed regulatory capacity requirements, enabling the containment system to capture 775,000 gallons above what is required by Chapter 22 of the National Fire Protection Association code. In addition to the proposed tanks, upgrades to the existing fire suppression system would be constructed as part of the proposed Project. Twenty-one foam makers would be installed



at the fuel farm; six surrounding each of the existing fuel tanks and nine surrounding the proposed storage tanks. Additionally, one foam chamber would be installed at each of the proposed fuel tanks and existing foam monitors would be updated.

Construction of three additional aviation fuel tanks at the existing fuel farm is proposed to meet the industry standards for on-airport aviation fuel reserves. The proposed Project would facilitate existing aviation activity and would also allow for repair of the fuel storage and conveyance system to occur without compromising fuel service. The proposed Project would not increase the number of passenger or aircraft operations at SDIA.

**PUBLIC REVIEW AND COMMENT:** The Draft EIR will be available for review and comment for forty-five (45) days commencing November 5, 2019 and ending December 20, 2019 at 5:00 PM. The Draft EIR is available for general public review on the website [www.san.org](http://www.san.org) (under link to Airport Projects/Environmental Affairs/CEQA & NEPA), and at the locations listed below (review days and times vary by location).

- 1) Airport Authority Administration Building (former Commuter Terminal) at San Diego International Airport, 3225 North Harbor Drive, 3<sup>rd</sup> Floor, San Diego, CA 92101, during the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday
- 2) San Diego Central Library, 330 Park Boulevard, San Diego, CA 92101
- 3) Mission Hills Branch Library, 215 W. Washington Street, San Diego, CA 92103
- 4) Point Loma/Hervey Library, 3701 Voltaire Street, San Diego, CA 92107
- 5) Ocean Beach Branch Library, 4801 Santa Monica Avenue, San Diego, CA 92107

Comments should be addressed to the San Diego County Regional Airport Authority, Attention: Ted Anasis. **The deadline for receiving written comments regarding the adequacy of the Draft EIR is December 20, 2019.** Comments may be submitted by:

- Mail to the Authority offices at SDCRAA, P.O. Box 82776, San Diego, CA 92138-2776 (these comments must be postmarked by Friday, December 20, 2019).
- Delivery to the Authority offices at San Diego International Airport, 3225 N. Harbor Drive, 3<sup>rd</sup> Floor, San Diego, CA 92101, or faxed to (619) 400-2459 by 5:00 p.m. on Friday, December 20, 2019.
- E-mail to the Authority offices at [planning@san.org](mailto:planning@san.org). The Airport Authority will accept comments to this notice via e-mail received by 5:00 p.m. on Friday, December 20, 2019.

Please contact Ted Anasis, Manager, Airport Planning, at (619) 400-2478, if you have any questions.

## TABLE OF CONTENTS

<b>1. Executive Summary.....</b>	<b>1-1</b>
1.1 Introduction .....	1-1
1.2 Purpose of the Draft EIR .....	1-1
1.3 Lead Agency .....	1-5
1.4 Summary of the Proposed Project.....	1-5
1.5 Organization of this Draft EIR.....	1-6
1.6 Summary of Environmental Impacts.....	1-7
1.6.1 Project Alternatives .....	1-8
1.6.2 Mitigation Measures .....	1-9
1.7 Topics of Known Concern/Areas of Controversy .....	1-9
<b>2. Project Description.....</b>	<b>2-1</b>
2.1 Background .....	2-1
2.2 Project Objectives.....	2-1
2.3 Project Location.....	2-1
2.4 Project Characteristics.....	2-5
2.5 Intended Uses of this Draft EIR .....	2-10
2.5.1 Permits and Approvals Required to Implement the Proposed Project .....	2-10
2.5.2 Related Environmental Review and Consultation Requirements.....	2-10
<b>3. Environmental Setting .....</b>	<b>3-1</b>
3.1 Introduction .....	3-1
3.2 Existing Physical Conditions .....	3-1
3.2.1 San Diego International Airport .....	3-1
3.2.2 Natural Features .....	3-1
3.3 Environmental Setting .....	3-2
3.3.1 Aesthetics .....	3-2
3.3.2 Biological Resources .....	3-2
3.3.3 Hazards and Hazardous Materials.....	3-3
3.4 Existing Land Use Plans and Policies.....	3-3
3.4.1 Airport Layout Plan.....	3-3

3.4.2	Airport Land Use Compatibility Plan .....	3-3
3.4.3	California Coastal Act .....	3-4
3.4.4	Port Master Plan .....	3-4
3.5	Development Settings .....	3-4
<b>4.</b>	<b>Environmental Impacts .....</b>	<b>4-1</b>
4.1	Introduction .....	4-1
4.1.1	Organization .....	4-1
4.1.2	Environmental Baseline.....	4-2
4.2	Aesthetics.....	4-2
4.2.1	Methodology .....	4-3
4.2.2	Existing Conditions .....	4-3
4.2.3	Thresholds of Significance.....	4-11
4.2.4	Impact Analysis .....	4-13
4.2.5	Significance of Impacts.....	4-13
4.2.6	Mitigation Measures .....	4-14
4.3	Biological Resources.....	4-14
4.3.1	Methodology .....	4-15
4.3.2	Existing Conditions .....	4-15
4.3.3	Thresholds of Significance.....	4-22
4.3.4	Impact Analysis .....	4-22
4.3.5	Significance of Impacts.....	4-23
4.3.6	Mitigation Measures .....	4-24
4.4	Hazards and Hazardous Materials .....	4-24
4.4.1	Methodology .....	4-24
4.4.2	Existing Conditions .....	4-25
4.4.3	Thresholds of Significance.....	4-32
4.4.4	Impact Analysis .....	4-32
4.4.5	Significance of Impacts.....	4-34
4.4.6	Mitigation Measures .....	4-35
4.5	Significant Irreversible Environmental Changes .....	4-35
4.6	Growth-Inducing Impacts.....	4-35
4.7	Cumulative Impacts .....	4-36

4.7.1	Assessment of Potential Cumulative Impacts on Aesthetics .....	4-36
4.7.2	Assessment of Potential Cumulative Impacts on Biological Resources .....	4-37
4.7.3	Assessment of Potential Cumulative Impacts on Hazards and Hazardous Materials.....	4-37
<b>5.</b>	<b>Alternatives .....</b>	<b>5-1</b>
5.1	Introduction .....	5-1
5.2	Factors Considered in the Selection of Alternatives .....	5-2
5.3	Project Objectives.....	5-3
5.4	Alternative 1 – No Project .....	5-3
5.4.1	Description of Alternative 1 – No Project.....	5-3
5.4.2	Analysis of Alternative 1 – No Project.....	5-5
5.5	Rejected Alternatives.....	5-6
5.5.1	Description of Alternative 2 – Mission Valley Terminal .....	5-6
5.5.2	Description of Alternative 3 – Off-Airport Fuel Tank .....	5-7
5.6	Environmentally Superior Alternative .....	5-7
<b>6.</b>	<b>Public Involvement, Preparers, and References and Acronyms.....</b>	<b>6-1</b>
6.1	Public Involvement.....	6-1
6.2	List of Preparers.....	6-1
6.2.1	Lead Agency.....	6-1
6.2.2	Draft EIR Preparation .....	6-1
6.3	References and Acronyms.....	6-3
6.3.1	References.....	6-3
6.3.2	Acronyms.....	6-6

## LIST OF APPENDICES

Appendix A	Initial Study for the Additional Fuel Tanks Project
Appendix B	Notice of Preparation
Appendix C	Notice of Preparation Comments

## LIST OF TABLES

Table 1-1	Summary of NOP Comments Received.....	1-2
Table 3-1	Past, Present, And Reasonably Foreseeable Projects .....	3-5

## LIST OF EXHIBITS

Exhibit 2-1	Airport Location Map.....	2-2
Exhibit 2-2	Project Vicinity Map.....	2-3
Exhibit 2-3	Existing Fuel Farm.....	2-6
Exhibit 2-4	Proposed Project Site Plan.....	2-7
Exhibit 2-5	Proposed Fire Suppression System Elements .....	2-9
Exhibit 4-1	Viewpoint Analysis Locations.....	4-4
Exhibit 4-2	Proposed Project Rendering Viewpoint 1.....	4-5
Exhibit 4-3	Proposed Project Rendering Viewpoint 2.....	4-6
Exhibit 4-4	Proposed Project Rendering Viewpoint 3.....	4-7
Exhibit 4-5	Proposed Project Rendering Viewpoint 4.....	4-8
Exhibit 4-6	California Least Tern Nesting Areas .....	4-19
Exhibit 5-1	Aviation Fuel Supply Chain .....	5-4

# 1. EXECUTIVE SUMMARY

## 1.1 INTRODUCTION

This document is a Draft Focused Environmental Impact Report (Draft EIR) for the San Diego International Airport (SDIA or the Airport) Additional Fuel Tanks Project (Project). This Draft EIR has been prepared by the San Diego County Regional Airport Authority (SDCRAA or the Airport Authority), which serves as the owner and operator of SDIA and the Airport Land Use Commission for San Diego County. In conformance with the California Environmental Quality Act (CEQA), SDCRAA is the lead agency in preparing this Draft EIR.

An Initial Study was prepared which identified the resource areas that could be subject to significant impacts from the Project (see **Appendix A**). Based on a preliminary review of the Project site and in consideration of the proposed activities associated with the proposed Project, SDCRAA determined that potentially significant impacts may occur relative to Aesthetics, Biological Resources, Hazards and Hazardous Materials, and their related cumulative impacts. As a result, these resources are evaluated further in this Draft EIR.

SDCRAA determined that impacts related to Agriculture and Forestry Resources, Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire would be less than significant through the analysis in the Initial Study and were not included for detailed analysis in this Draft EIR (see Appendix A). A Notice of Preparation (NOP) for the Draft EIR was circulated for a 30-day comment period from November 28, 2018 to December 28, 2018 (see **Appendix B**). A total of 10 comment letters in response to the NOP were received from government agencies, a Native American tribal representative, and private citizens (see **Table 1-1** below). The CEQA-related comments included suggestions for the consideration of alternatives to specific fuel tank and associated infrastructure technologies and siting preferences, concerns over containment plans and features, and requests for a detailed analysis of certain elements of the environment including aesthetics, geologic features and fault zones, biological and coastal resources, and hazards and hazardous materials. The comments also requested identification and detailed discussion of project components including the fire suppression system and construction haul routes be included in the Draft EIR. Where appropriate, information and analyses that address such CEQA-related comments have been incorporated into this Draft EIR. The comment letters received on the NOP are included as part of **Appendix C**.

## 1.2 PURPOSE OF THE DRAFT EIR

The purpose of this Draft EIR is to inform decision makers and the general public of the nature of the proposed Project, the potential for significant impacts on the environment to occur as a result of the proposed Project, and the manner in which those significant impacts can be avoided or reduced.

TABLE 1-1 (1 OF 3) SUMMARY OF NOP COMMENTS RECEIVED

DATE	COMMENTS	SUMMARY OF COMMENT(S)
December 3, 2018	Katy Sanchez, Associate Environmental Planner, State of California Native American Heritage Commission (NAHC)	Provided an overview of California Assembly Bill 52 (AB 52) and the tribal consultation requirements and provided NAHC recommendations for conducting cultural resource assessments.
December 17, 2018	James Gilhooly, Private Citizen	Requested confirmation of the proximity of the proposed Project to population centers, passenger terminals, and requested verification of the distance of the proposed Project to property lines.
		Provided an explanation of potential impacts should a failure of a fuel pipeline occur and requested confirmation on whether the proposed Project is in an "exclusion zone" or if a buffer zone has been set up.
		Requested confirmation that applicable standards and measures to protect construction workers and the public would be utilized.
December 19, 2018	Gillian Ackland, Private Citizen	Requested confirmation on whether environmental, land use, and development permits had been granted.
		Noted that the proposed Project could have significant impacts relative to aesthetics, biological (coastal) resources, hazards and hazardous materials, and cumulative effects which are not adequately defined or avoided in the project.
December 20, 2018	John Misleh, Program Coordinator, Department of Environmental Health – Hazardous Materials Division (HMD), County of San Diego	Requested that all construction-related hazardous waste (i.e., oil, paint waste, lead paint debris, etc.) generated onsite be properly classified, labeled, and handled appropriately. Additionally, noted all waste must be disposed of by a California registered hazardous waste hauler and noted the potential need for a Unified Program Facility Permit.
		Noted that hazardous materials handled and stored would require a revised hazardous materials business plan submittal to the County of San Diego HMD via the California Environmental Reporting System (CERS).
		Noted that the facility operator is required to submit a Hazardous Materials Questionnaire to the HMD and complete the HMD Hazardous Materials Plan Check.
		Noted a revised Spill Prevention Control and Countermeasure Plan is required as is demonstration of compliance with the Aboveground Petroleum Storage Act, and the California Health and Safety Code, Section 25270.
		Noted that during and post construction the HMD has authority to regulate facilities that handle hazardous waste and will apply the authority as necessary.
		Requested that if soil and/or groundwater contamination containing hazardous substances is discovered or encountered during excavation, construction, or grading activity, the Airport Authority shall investigate the contamination and report the release to the HMD and applicable State/federal agency.

TABLE 1-1 (2 OF 3) SUMMARY OF NOP COMMENTS RECEIVED

DATE	COMMENTS	SUMMARY OF COMMENT(S)
December 20, 2018 (Continued from previous page)	John Misleh, Program Coordinator, Department of Environmental Health – Hazardous Materials Division (HMD), County of San Diego	Requested that if an underground storage tank (UST) is unexpectedly discovered during site work which previously held a hazardous substance, the Airport Authority shall apply for a UST removal permit in accordance with state law before removing the tank and connected piping.
		Noted that underground piping associated with an airport hydrant system and connected to above-ground fuel storage tanks may be regulated as an UST system, if 10 percent or more of the total storage capacity is underground, then the project would meet the definition of a regulated UST system and a UST installation permit may be required.
		Noted if the Airport Authority is installing an unburied tank system in an underground area/structure or in a vault as part of the proposed Project, there are new regulations and laws for these systems. Information can be found at: <a href="http://osfm.fire.ca.gov/cupa/pdf/TIUGA-Laws-n-Regs_04Apr2018.pdf">http://osfm.fire.ca.gov/cupa/pdf/TIUGA-Laws-n-Regs_04Apr2018.pdf</a> .
December 21, 2018	Heidi Vonblum, Program Manager, City of San Diego Planning Department	Noted the NOP is inconsistent in that it describes the proposed Project as including three additional fuel storage tanks to the northeast of the existing above-ground storage tanks, while NOP Exhibit 1, Project Location, shows the tanks being southwest of the existing above-ground storage tanks.
		Should a Transportation Impact Analysis be conducted, it should follow the guidelines of the City of San Diego Traffic Impact Study Manual (July 1998) and should apply City of San Diego CEQA Significance Determination Thresholds (July 2016).
		Requested the Draft EIR include a discussion and potentially an analysis of traffic impacts associated with the proposed Project.
December 21, 2018	Lesley Nishihira, Director, Planning Department, San Diego Unified Port District Planning Department	As part of the Project Description, confirm that aviation fuel would be delivered to the proposed storage tanks via the current Airport Delivery Fuel Line (or Buckeye Pipeline), and that no new pipeline would be needed to convey the jet fuel.
		As part of the Project Description, commenter requested the Airport Authority describe the leak detection system for the fuel storage and delivery system, as well as the regulatory oversight program, for the existing and proposed facility.
		Noted the San Diego Unified Port District support of extending the existing containment area to accommodate three new fuel storage tanks. The Draft EIR should include additional information about the containment area, including secondary containment information, in the event there is a breach of the tanks.
		Requested the Draft EIR describe how the fire suppression system would be expanded to address the additional jet fuel being stored onsite.
		Requested that Draft EIR should explain spill prevention and spill response practices and procedures that are employed when transferring / loading fuel in and out of the facility.
		Requested the Draft EIR's Transportation section identify the truck route that would be used to delivery jet fuel to the new tanks, in the event that on-road trucks are needed to deliver jet fuel to the airport.
		Requested the Draft EIR note the existing daycare facility located on the U.S. Marine Corps Recruit Depot San Diego (MCRD) facility and establish appropriate safeguards to ensure that the proposed project would not result in adverse effects on this nearby facility.



TABLE 1-1 (3 OF 3) SUMMARY OF NOP COMMENTS RECEIVED

DATE	COMMENTS	SUMMARY OF COMMENT(S)
December 21, 2018 (Continued from previous page)	Lesley Nishihira, Director, Planning Department, San Diego Unified Port District Planning Department	Requested that the Draft EIR note that the proposed location of the three new jet fuel storage tanks are in the vicinity of an old firefighting test pit, and that there may be some contamination in the area.
		Noted the new fuel storage tanks are potential predator perches. Requested that the Draft EIR address potential modifications and/or other practices that can be employed, to reduce the likelihood of additional predator perching.
		Requested that the Draft EIR evaluate impacts to California least terns during construction activities.
		Requested the Draft EIR incorporate the District's Port Master Plan Update's (PMPU's) potential program-level development ranges for Shelter Island, Harbor Island, and the Embarcadero Planning Districts, which was provided via email on September 7, 2017, for any cumulative project analysis that needs to be performed. Commenter noted that the District will provide any updated development ranges for these three planning districts, as the PMPU progresses in 2019.
December 28, 2018	Alan Gordon, Private Citizen	Expressed concern over the fuel containment area and remarked that the proposed size is inadequate, particularly if multiple tanks are compromised.
		Noted the proposed height of the fuel tanks exceeds the California Coastal Commission 30-foot height limit within the City of San Diego and needs analysis in the EIR.
December 28, 2018	Katheryn Rhodes, Private Citizen	Requested the EIR analyze climate change and the potential biological and structural impacts of potential sea level rise to the proposed fuel tanks.
		Requested fault investigations submitted to the State Geologist to confirm or deny active faulting in the area surrounding the proposed Project. Commenter provided history on the nearby Alquist-Priolo earthquake hazard zone located on the east side of Airport property, near the Rental Car Center. Additionally, requested further information on how the project would turn in fault investigations to update the dated 2003 Point Loma Quadrangle AP-Maps to the State Geologist and the San Diego Association of Governments.
		Requested the Airport consider a bathtub structural foundation as opposed to above-ground tanks and unknown foundations. Commenter noted the used of bathtub foundations would remove liquefiable soils and would place the proposed fuel tanks on bedrock, slightly below ground. Reference bathtub foundations used for the San Diego County Administration Center, San Diego Unified Port District Headquarters, and planned use at the Manchester Pacific Gateway Navy Broadway Complex and Seaport Village.
		Requested consideration of watertight bulkhead configurations to solely concrete dike walls.
January 3, 2019	Colonel Carl Huenefeld II, Marine Corps Recruit Depot (MCRD)- San Diego	Noted a concern over the containment plan and if the ability to handle the rupture of a single tank is adequate.
		Requested confirmation of the applicability of a 50-foot National Fire Protection Association (NFPA) buffer requirement from the MCRD-San Diego property line, which initial exhibits of the proposed Project show the containment berms within.
January 28, 2019	Ray Teran, Resource Management, Viejas Band of Kumeyaay Indians	Noted that the project site has cultural significance or ties to Viejas Band of Kumeyaay Indians and requested that a Kumeyaay Tribal Cultural Monitor be onsite for ground disturbing activities.

SOURCES: Comment Letters in Appendix C of this Draft EIR; Ricondo & Associates, Inc., January 2019.

This Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

### 1.3 LEAD AGENCY

The "lead agency" is the "public agency which has the principal responsibility for carrying out or approving a project."<sup>1</sup> SDCRAA, acting as the owner and operator of SDIA, is the lead agency for the proposed Project and is responsible for complying with the requirements of CEQA and the State CEQA Guidelines.

Additionally, the California Coastal Commission (Coastal Commission) and County of San Diego are agencies with "jurisdiction by law" over the proposed Project as each local agency has primary jurisdiction over areas that could be affected by the proposed Project. These local agencies will use this EIR as their basis for their decisions to issue approvals and/or permits that may be required. These agencies may also be consulted for information and input related to the proposed Project. Potential associated permits or approvals required for components of the proposed Project include:

- California Coastal Commission – California Coastal Development Permit<sup>2</sup>
- County of San Diego Department of Environmental Health, Hazardous Materials Division – Certified Unified Program Facility Permit

The proposed Project would require Federal Aviation Administration (FAA) approval and the preparation and completion of appropriate National Environmental Policy Act (NEPA) documentation.

### 1.4 SUMMARY OF THE PROPOSED PROJECT

The Airport Authority operates SDIA, a large hub airport serving San Diego County, California and the surrounding area. The Airport maintains an aviation fuel storage and distribution facility ("fuel farm") to ensure aviation fuel is immediately and equitably available to aircraft operators at SDIA and ensure scheduled aircraft operations can continue for several days in the event the supply of fuel to the Airport is interrupted. The existing fuel farm, constructed in the early 1990s, contains two fuel tanks and is supplied by regional refineries via the existing Airport fuel delivery pipeline.<sup>3</sup> Any lapse or shortage in the on-airport fuel delivery system, as well as inspection and

---

<sup>1</sup> Title 14, California Code of Regulations, Division 6, Chapter 3, *Guidelines for Implementation of the California Environmental Quality Act*, Section 15367; California Public Resources Code §21067.

<sup>2</sup> The Airport Authority would consult the California Coastal Commission to assess whether the proposed Project would require a California Coastal Development.

<sup>3</sup> Argus, *Engineering Study for SAN Supply Chain*, July 2017.

maintenance activities of the pipeline or fuel farm systems, requires fuel to be delivered to the Airport via truck, which results in substantially slower and less reliable replenishment of the fuel farm supply.

Passenger levels at SDIA increased by nearly 40 percent since 2010, accommodated by an increase in daily aircraft operations and the use of larger aircraft with higher seating capacity.<sup>4</sup> The increase in number of operations and size of aircraft currently serving the Airport has resulted in a correlated increase in daily aviation fuel use, which has expedited depletion of on-Airport fuel reserves. In July 2018, the peak aviation activity month, the fuel farm could accommodate approximately 2 days of fuel.<sup>5</sup> The industry standard for airports similar to SDIA is a 5- to 7-day supply of fuel.

The airlines are proposing the construction of three additional aviation fuel tanks at the existing fuel farm to meet the industry standards for on-airport aviation fuel reserves. The proposed Project would facilitate existing aviation activity and would also allow for repair of the fuel storage and conveyance system to occur without compromising fuel service. The proposed Project would not increase the number of passenger or aircraft operations at SDIA. Airport capacity is a function of the airport's physical facilities or components; its layout or geometry; its operating environment, including the airspace allocated to the airport; the aircraft fleets utilizing the airport; and weather conditions.<sup>6</sup> Within the existing SDIA airfield capacity, any growth in number of passengers or aircraft operations would occur regardless of on-Airport fuel storage capacity. In the absence of the proposed Project, airlines would be reliant on trucked fuel deliveries to supplement on-Airport fuel shortfalls due to lack of on-Airport storage capacity, in the event of interruption of the Airport fuel delivery pipeline supplying the fuel farm, or from the temporary shutdown of one or both of the existing fuel tanks due to maintenance needs or emergency stoppage.

## 1.5 ORGANIZATION OF THIS DRAFT EIR

This Draft EIR, which has been prepared in accordance with CEQA Statute and Guidelines requirements, is organized into six sections:

- Section 1.0, Executive Summary, highlights the main components of the proposed Project, the findings of the environmental impact analysis, and alternatives that were considered.
- Section 2.0, Project Description, contains a comprehensive description of the proposed Project, including a detailed overview of Project components and objectives.
- Section 3.0, Environmental Setting, discusses existing physical conditions in the vicinity of the proposed Project area. It discusses existing land use in the area and includes an overview of the existing relevant land use plans and policies. This section also describes the past, present, and reasonably foreseeable projects, including other Airport development projects, that could, in conjunction with the proposed Project, result in cumulative impacts relative to aesthetics, biological resources, or hazards and hazardous materials.
- Section 4.0, Environmental Impacts, contains the impacts analysis and specifically considers the direct, indirect, and cumulative environmental impacts that would result from the proposed Project relative to aesthetics,

---

<sup>4</sup> San Diego County Regional Airport Authority, *Air Traffic Report Summary, Calendar Year 2018*. Available: [https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core\\_Download&language=en-US&PortalId=0&TabId=403](https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core_Download&language=en-US&PortalId=0&TabId=403) (accessed March 15, 2019).

<sup>5</sup> Burns & McDonnell, *SAN Tanks Project Information*, November 12, 2018.

<sup>6</sup> Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Report No. 79 – Evaluating Airfield Capacity*, 2012.

biological resources, and hazards and hazardous materials. Other effects of the proposed Project are also considered, including whether the proposed Project would result in significant irreversible environmental changes, significant unavoidable effects, and growth-inducing effects.

- Section 5.0, Alternatives, identifies and evaluates alternatives to the proposed Additional Fuel Tanks Project and considers whether the alternatives would meet the overall project objectives.
- Section 6.0, Public Involvement, Preparers, and References and Acronyms, describes the processes by which the public was engaged during the environmental documentation and review processes. Section 6.0 also identifies the preparers of this Draft EIR and identifies the documents relied upon and cited throughout this Draft EIR, as well as acronyms used throughout this Draft EIR.
- In addition to the sections identified above, this Draft EIR also is supplemented by the following appendices:
  - **Appendix A** includes the Initial Study
  - **Appendix B** includes the November 2018 Notice of Preparation for this Draft EIR
  - **Appendix C** documents the EIR Scoping Period including public comment letters received in response to the NOP and tribal consultation

## 1.6 SUMMARY OF ENVIRONMENTAL IMPACTS

Based on the Initial Study (Appendix A), SDCRAA determined that preparation of an EIR was required because of the potential for significant impacts relative to aesthetics, biological resources, and the generation and use of hazardous materials as a result of construction and operation of the proposed Project. The proposed Project was analyzed for the potential to result in impacts to aesthetics; specifically, impacts to scenic vistas and the character and quality of the proposed Project site and its surroundings. Based on visual simulations of the proposed new fuel tanks from key off-airport public viewing locations and, given that the proposed Project site is within a highly-developed Airport surrounded by urban development, the proposed Project would not result in any significant impacts on a scenic vista or scenic quality.

The proposed Project was also analyzed for the potential to result in impacts to biological resources; specifically, impacts to the California least tern, and the associated habitat, and impacts to the Coastal Zone. SDIA is completely within the California Coastal Zone and contains habitat for the California least tern, a state and federally listed species, during nesting season. The proposed Project has the potential to impact biological resources due to its proximity to, and sensitivity of, the California least tern and the associated habitat and the Project's location within the Coastal Zone. However, due to the distance of the proposed Project site from the nearest California least tern nesting area (approximately 2,500 linear feet to the southeast and on the opposite side of the active runway), impacts to biological resources associated with construction and operation of the proposed Project would be less than significant.

Lastly, the proposed Project was analyzed for impacts related to hazards and hazardous materials. The proposed Project would necessarily involve the use of hazardous materials during construction and use and storage of hazardous materials during operation. Due to the nature of airport operations and fuel storage and distribution activities, the proposed Project has the potential to create and expose humans and the environment to hazards and hazardous materials during construction, in the event previously unknown contaminated soils are discovered, and during operation of fuel transference activities. Implementation of construction best management practices (BMP), adherence to applicable building codes, and proposed mitigation (development/implementation of a Hazardous

Materials Management Plan and Hazardous Materials Release Response Plan) would reduce the potential impact to a less than significant level.

The Initial Study concluded that the following resources would not be significantly impacted and would not require further analysis in this Draft EIR:

- Agriculture and Forestry Resources
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

### 1.6.1 PROJECT ALTERNATIVES

The Draft EIR is required, per State CEQA Guidelines Section 15126.6, to include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but, would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives.” Section 4.0 of this draft contains a discussion of potential impacts to aesthetic, biological resources, and hazards and hazardous materials. Section 5.0, Alternatives, addresses alternatives to the proposed Project, including constructing additional fuel storage at an off-Airport location, constructing additional fuel storage at the existing SDIA fuel farm, and a “no project” alternative. Analysis determined that the proposed Project would not result in significant impacts with mitigation; therefore, alternatives to the proposed Project were not examined in detail. Mitigation is required in the event that unknown contaminated soils are encountered during construction. Although the No Project alternative would avoid encountering unknown contaminated soils, it would not necessarily result in lesser environmental effects as the contaminated soils, if they exist, would exist under the No Project and proposed Project alternatives. Additionally, the proposed Project would result in less operational emissions and traffic when compared to the No Project alternative and is, therefore, the environmentally superior alternative.

## 1.6.2 MITIGATION MEASURES

Based on the analysis in this Draft EIR and accompanying Initial Study, the proposed Project would not result in any significant, unavoidable impacts or contributions to cumulatively considerable impacts with the implementation of the mitigation measure HZ-1, Hazardous Materials Management Plan and Hazardous Materials Release Response Plan. Mitigation measure HZ-1 comprises the preparation of a Hazardous Materials Management Plan and Hazardous Materials Release Response Plan prior to construction and adherence to the plans during construction activities.

## 1.7 TOPICS OF KNOWN CONCERN/AREAS OF CONTROVERSY

The SDCRAA received 10 comment letters in response to the NOP published and tribal outreach conducted for the proposed Project. A summary of the NOP and tribal outreach comments received is provided in Table 1-1.

Regarding comments received in response to the NOP and tribal outreach related to tribal cultural resources, as discussed in Section 4.18 of the Initial Study (Appendix A), in accordance with California Assembly Bill 52 (AB 52), letters regarding the Additional Fuel Tanks Project were sent to the two tribes requesting information on Airport projects. In response, the Viejas Band of Kumeyaay Indians determined the Project site has cultural significance or ties to the tribe and have requested that a Kumeyaay Cultural Monitor be on-site for ground disturbing activities. Although there are no known tribal cultural resources, as defined in Public Resources Code Section 21074, on the Project site, ground disturbance associated with construction of the proposed Project could disturb previously unidentified tribal cultural resources on the Project site. To address this contingency, the SDCRAA has voluntarily agreed to implement Excavation Monitoring, as part of the construction program for the proposed Project. Under the agreed-upon Excavation Monitoring program, a Kumeyaay Cultural Monitor will be present on-site during ground disturbing activities that involve soils that are not previously dredged/filled materials below the Airport for the proposed Project. Such monitoring would serve to address the potential, if any, for tribal cultural resources to be unexpectedly encountered during Project-related excavation activities.

## 2. PROJECT DESCRIPTION

This section describes the proposed Project – the proposed Additional Fuel Tanks at SDIA. It includes subsections explaining background information regarding existing fuel supply and limitations at the Airport, the purpose and objectives of the proposed Additional Fuel Tanks, and the intended uses of this Draft EIR.

### 2.1 BACKGROUND

SDIA is the largest commercial service airport in San Diego County. The Airport is classified as a large-hub airport using the FAA’s National Plan of Integrated Airport Systems criteria. SDIA served more than 24.2 million passengers in 2018 on 199,183 air carrier operations, making it the busiest single-runway airport in the United States and third busiest single-runway airport in the world.<sup>1</sup> Passenger traffic has increased by nearly 40 percent since 2010 and operations have increased more than 16 percent over the same period.<sup>2</sup> SDIA primarily serves non-stop short- and medium-haul domestic operations and flights to Hawaii; however, the Airport also serves a small, but growing number of international destinations. Additionally, DHL, Federal Express and UPS operate air cargo operations and the Airport also accommodates a fixed base operator (FBO) facility. As the main commercial service airport in San Diego County, SDIA is an integral component of the regional transportation network, the California Aviation System Plan, and the National Airspace System.

### 2.2 PROJECT OBJECTIVES

The objective of the proposed Project is to increase fuel storage at the Airport to meet industry fuel reserve standards for existing aircraft operations and to accommodate supply pipeline shutdowns or fuel farm maintenance activities without compromising aircraft refueling service. Additionally, the proposed Project would greatly reduce the need for, and risks associated with, fuel resupply or supplementation via tanker truck.

### 2.3 PROJECT LOCATION

SDIA is located within City of San Diego limits, approximately one-mile northwest of the San Diego central business district (see **Exhibit 2-1**). The Airport occupies 661 acres and is bound to the west by Liberty Station mixed-use development and the Navy Boat Channel; to the north by the U.S. Marine Corps Recruit Depot San Diego (MCRD); Pacific Highway, industrial uses, and Interstate 5 to the north and east; and North Harbor Drive, the U.S. Coast Guard Sector San Diego, San Diego Harbor Police Department, marina and hotel uses, and San Diego Bay to the south (see **Exhibit 2-2**). As described above, SDIA conducts all aircraft operations on a single, east-west runway which lies north and east of the Airport’s terminal facilities and west of the Rental Car Center.

---

<sup>1</sup> San Diego County Regional Airport Authority, *Air Traffic Report Summary, Calendar Year 2018*. Available: [https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core\\_Download&language=en-US&PortalId=0&TabId=403](https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core_Download&language=en-US&PortalId=0&TabId=403) (accessed March 15, 2019).

<sup>2</sup> San Diego County Regional Airport Authority, *Air Traffic Report Summary, Calendar Year 2018*. Available: [https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core\\_Download&language=en-US&PortalId=0&TabId=403](https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core_Download&language=en-US&PortalId=0&TabId=403) (accessed March 15, 2019).



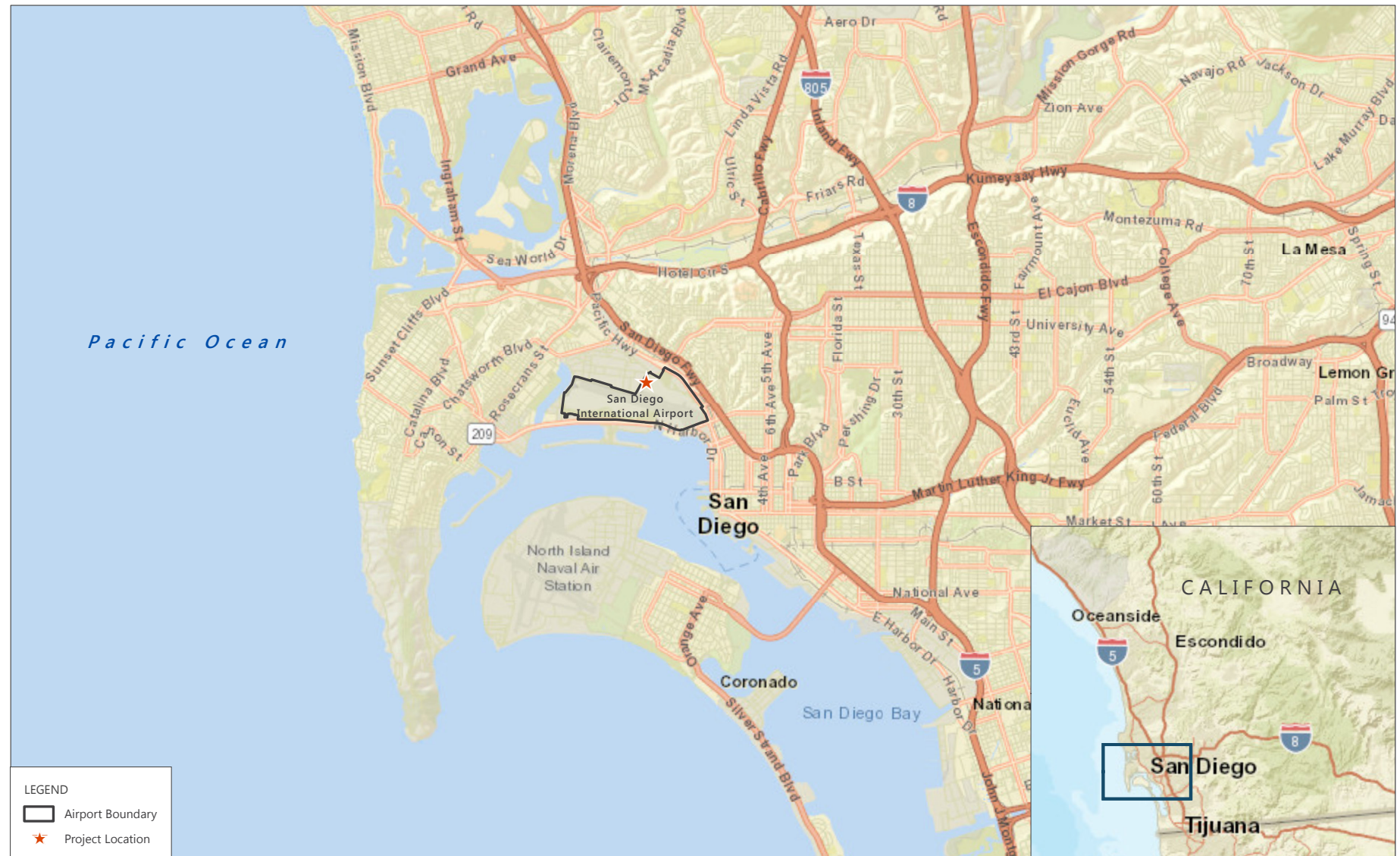
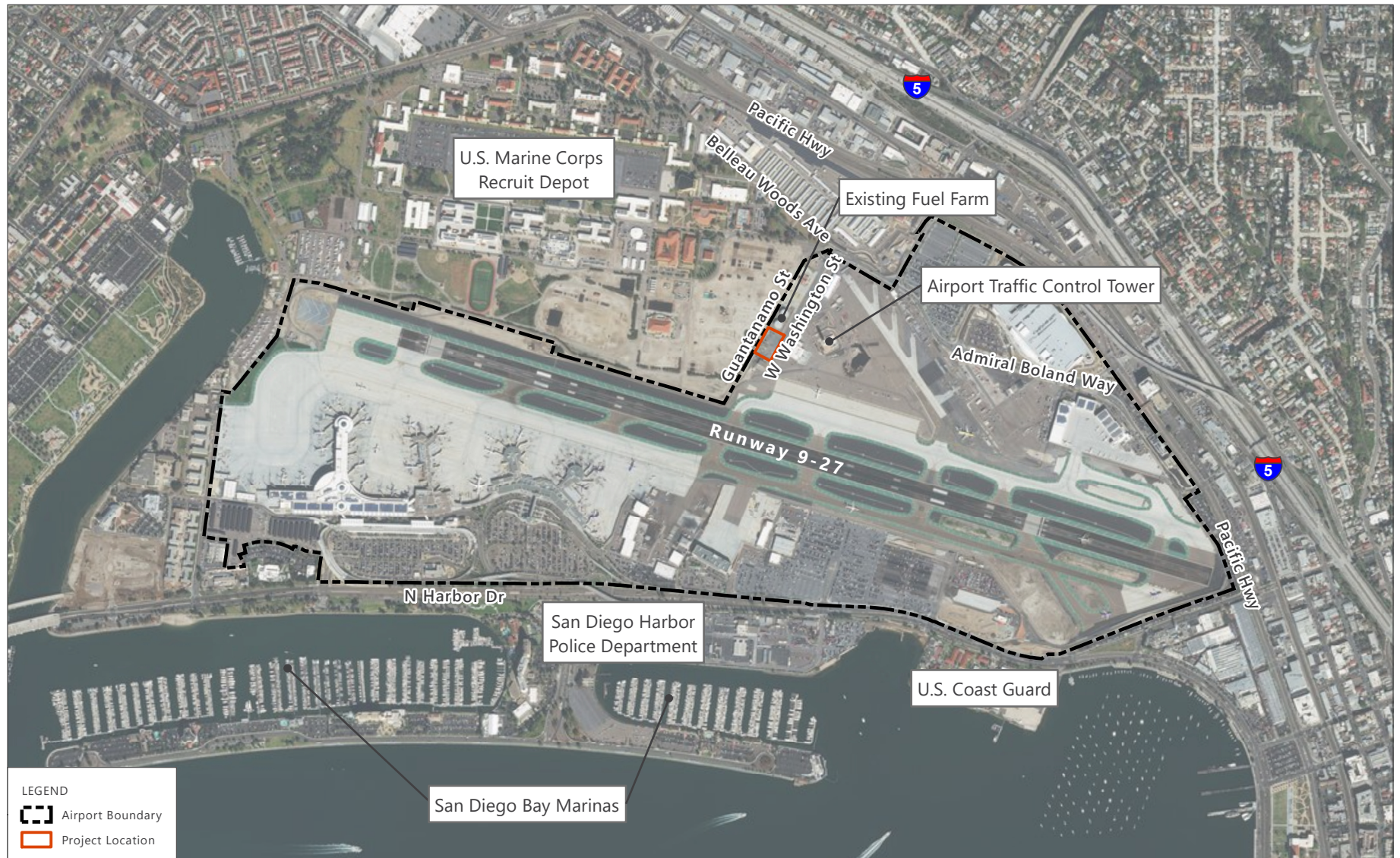


EXHIBIT 2-1



AIRPORT LOCATION MAP





SOURCES: San Diego County Regional Airport Authority, *Airport Layout Plan*, 2009 (Airport property); Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, December 2017 (imagery basemap); Ricondo & Associates, Inc., December 2018 (project location).

**EXHIBIT 2-2**



**PROJECT VICINITY MAP**

P:\GIS\Projects\SAN\MXD\SAN\_FuelTanks\_Ex2-2\_ProjectVicinityMap\_20190319.mxd

Additional Fuel Tanks Project

Draft EIR

The City of San Diego General Plan outlines the City's objectives and guidelines for all phases of future development by providing a broad range of policies to guide land development and quality of life decision-making within the City. SDIA is not located within the General Plan planning area; however, the General Plan includes goals specific to airport-land use planning in proximity to SDIA, as well as other public use and military aviation facilities. The airport-specific goals identified in the General Plan address protection of the health, safety, and welfare of persons within the Airport Influence Area (AIA) by minimizing the public's exposure to high levels of noise and risk of aircraft accidents and addresses protection of public use airports and military air installations from the encroachment of incompatible land uses within an AIA that could unduly constrain airport operations.

The majority of SDIA property, as well as Harbor Island to the south, is identified by the City as "Reserve" (i.e., not located within a designated Community Planning Area). The Midway-Pacific Highway Community Plan<sup>3</sup> has specific land use policy recommendations related to SDIA that include providing zoning and land use designations for airport-related commercial uses in areas which are most impacted by flight operations and limiting residential development in areas subject to high community noise levels. The Uptown Community Plan<sup>4</sup> designates most of the area in the vicinity of SDIA for residential uses (Mission Hills and Park West) with some commercial uses bordering I-5 (Middletown). The Peninsula Community Plan and Local Coastal Program Land Use Plan (Peninsula Community Plan)<sup>5</sup> designates the plan area as residential uses with commercial uses fronting San Diego Bay and military-related industrial uses bordering SDIA and the southern portion of the peninsula. These community plans, as well as the San Diego Downtown Community Plan,<sup>6</sup> identify land use policy recommendations for the Airport to minimize the risk of injury, life loss, and property damage, and to consider noise impacts when making land use planning decisions. In addition to these recommendations, the Uptown Community Plan recommends coordination in seeking public transit connection opportunities between SDIA and the Uptown Community Planning Area.

SDIA is located on State tidelands leased from the San Diego Unified Port District (the Port District) property; however, the Airport is independently planned and operated by the SDCRAA. The Airport is within one of the Port Master Plan (PMP) planning districts, District 2 – Harbor Island, and adjacent to two other Port District planning districts; District 1 – Shelter Island to the southwest, and District 3 – Centre City/Embarcadero to the southeast. The PMP identifies existing and future land uses and planning policy for properties within the Port District's planning jurisdiction, which comprise the tide and submerged lands conveyed and granted in trust to the Port.<sup>7</sup> The Airport is comprised of five subdistricts identified in the Harbor Island District, including SDIA, which recognizes the long-term commitments of existing aviation uses, the authority of SDCRAA's jurisdiction over Airport property, and the importance of airport-related uses in areas immediately adjacent to SDIA. However, the Port District has no

---

<sup>3</sup> City of San Diego, *Midway-Pacific Highway Community Plan*, September 17, 2018. Available: [https://www.sandiego.gov/sites/default/files/midway\\_-\\_pacific\\_highway\\_community\\_plan\\_sept\\_2018\\_0.pdf](https://www.sandiego.gov/sites/default/files/midway_-_pacific_highway_community_plan_sept_2018_0.pdf). Although the Midway-Pacific Highway Community Plan was adopted by the San Diego City Council on September 17, 2018, the plan is not effective in the Coastal Zone until the community plan is certified by the California Coastal Commission.

<sup>4</sup> City of San Diego, *Uptown Community Plan*, November 14, 2016, as amended June 12, 2018. Available: <https://www.sandiego.gov/planning/community/profiles>.

<sup>5</sup> City of San Diego, *Peninsula Community Plan and Local Coastal Program Land Use Plan*, July 14, 1987, last amended 2011. Available: <https://www.sandiego.gov/planning/community/profiles>.

<sup>6</sup> Centre City Development Corporation, *San Diego Downtown Community Plan – Rising on the Pacific*, Adopted April 2006, last amended 2016. Available: <http://civicsd.com/departments/planning/planning-regulatory-documents/>.

<sup>7</sup> Port of San Diego, *Port Master Plan*, 2017.



jurisdictional authority over Airport property and neither the PMP, nor the associated land use designations, are applicable to SDIA pursuant to the San Diego County Regional Airport Authority Act.

The Port District is in the process of updating the PMP (referred to as the Port Master Plan Update, or PMPU) and a Discussion Draft of the document was released for a 90-day public review period ending in July 2019. Consistent with the PMP, the PMPU Discussion Draft identifies SDIA as a part of the Harbor Island Planning District; however, due to the Airport's jurisdictional independence, SDIA property is excluded from PMPU land use planning.

The proposed Project site, as depicted on **Exhibit 2-3**, consists of a paved parking area and a small parcel of exposed soil and disturbed non-native vegetation immediately adjacent to the existing fuel farm, which is located in the northeast corner of the Airport property, between MCRD and the Air Operations Area (AOA). An existing aviation fuel storage tank and containment dike lie immediately north of the proposed Project site. The boundary fence of MCRD lies immediately west of the proposed Project site and the Aircraft Rescue and Fire Fighting (ARFF) facility lies immediately south.

## 2.4 PROJECT CHARACTERISTICS

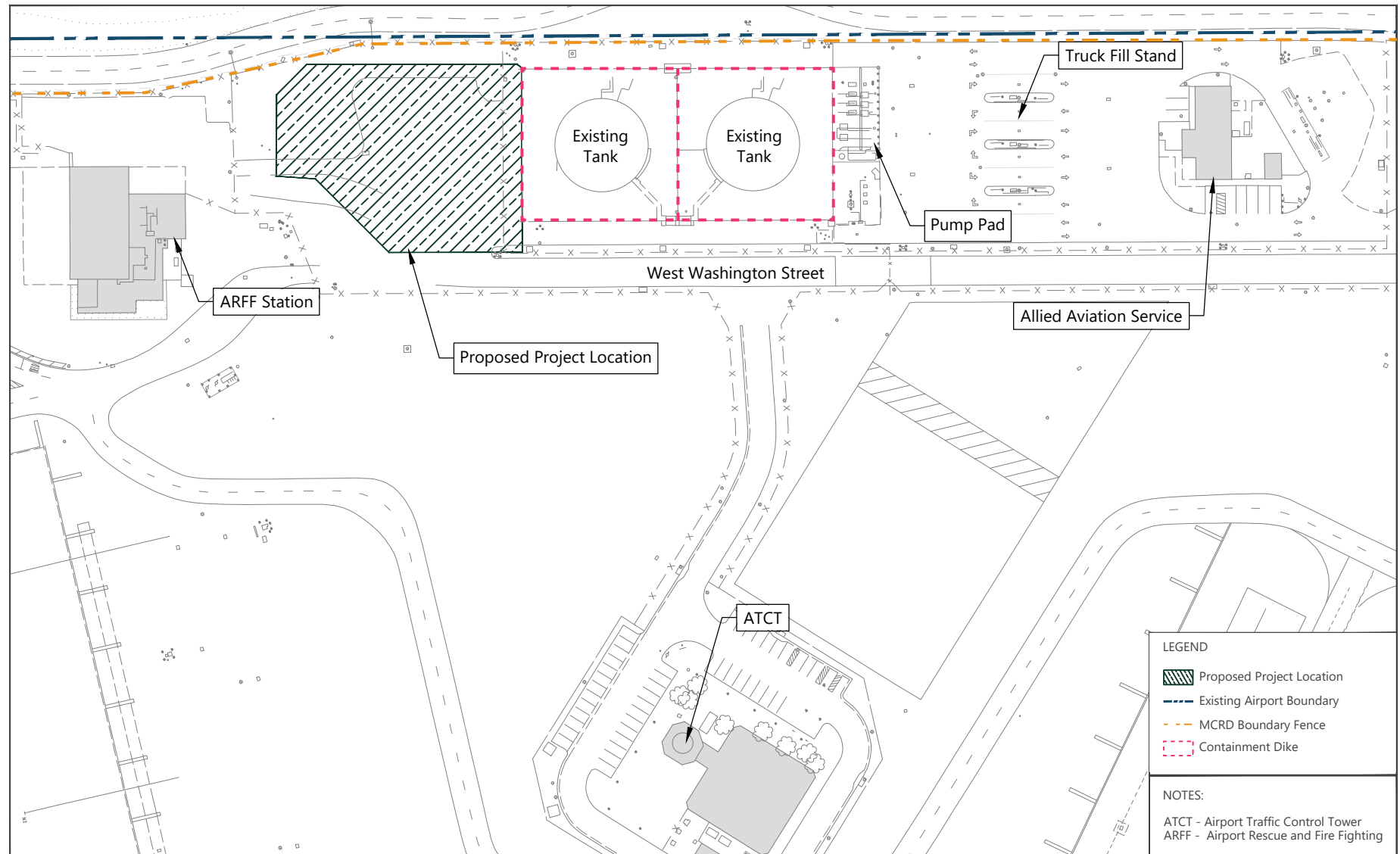
Prior to 1994, the year in which operation of the existing fuel farm began, aviation fuel for SDIA was delivered via tanker truck from the Mission Valley Terminal, approximately 10 miles east of the Airport. In 2000, a pipeline delivering fuel from the 10th Avenue Marine Terminal began operation and fuel was delivered directly to the fuel farm storage tanks. The existing fuel farm comprises two 1-million-gallon fuel storage tanks with a total storage capacity of approximately 1,713,600 gallons of fuel.<sup>8</sup> Since the construction of the existing fuel farm, aircraft operations and passenger enplanements have increased through the use of larger aircraft and additional scheduled operations. Accordingly, fuel consumption at SDIA has increased, resulting in a reduction in the number of days of fuel reserves located on-Airport.

Fuel stores at SDIA are supplied by a regional pipeline that serves a number of fuel types and storage facilities in southern California. Due to the regional demand that is placed on the supply system and limited capacity of the fuel farm, resupply of SDIA's full fuel storage capacity, via regional resources, can only be accommodated once every seven days. The existing fuel reserve capacity is well below industry standards, making SDIA operations susceptible to pipeline malfunctions and making it difficult for SDIA to take the tanks offline to perform facility maintenance. The proposed Project would increase the capacity of the Airport's fuel storage facilities to accommodate an industry standard of six days of peak-period fuel demand reserves by constructing three 1,146,320-gallon (shell volume) fuel tanks, with a usable storage capacity of approximately 966,000 gallons each, adjacent to the existing fuel farm, as shown on **Exhibit 2-4**.

A three-tank concept is proposed, as opposed to a single tank, to allow flexibility in fuel reception, distribution, and maintenance activities. The existing fuel tanks would remain in place and in operation following construction of the proposed Project. One or more tanks could be briefly taken out of service for repair or maintenance without substantially impacting fuel farm reserves and operations.

---

<sup>8</sup> Argus, *Engineering Study for SAN Supply Chain*, July 2017.



SOURCE: San Diego International Airport, Airport Layout Plan, Updated October 2009 (basefile); Burns and McDonnell, December 2018 (additional storage tanks site plan).

**EXHIBIT 2-3**

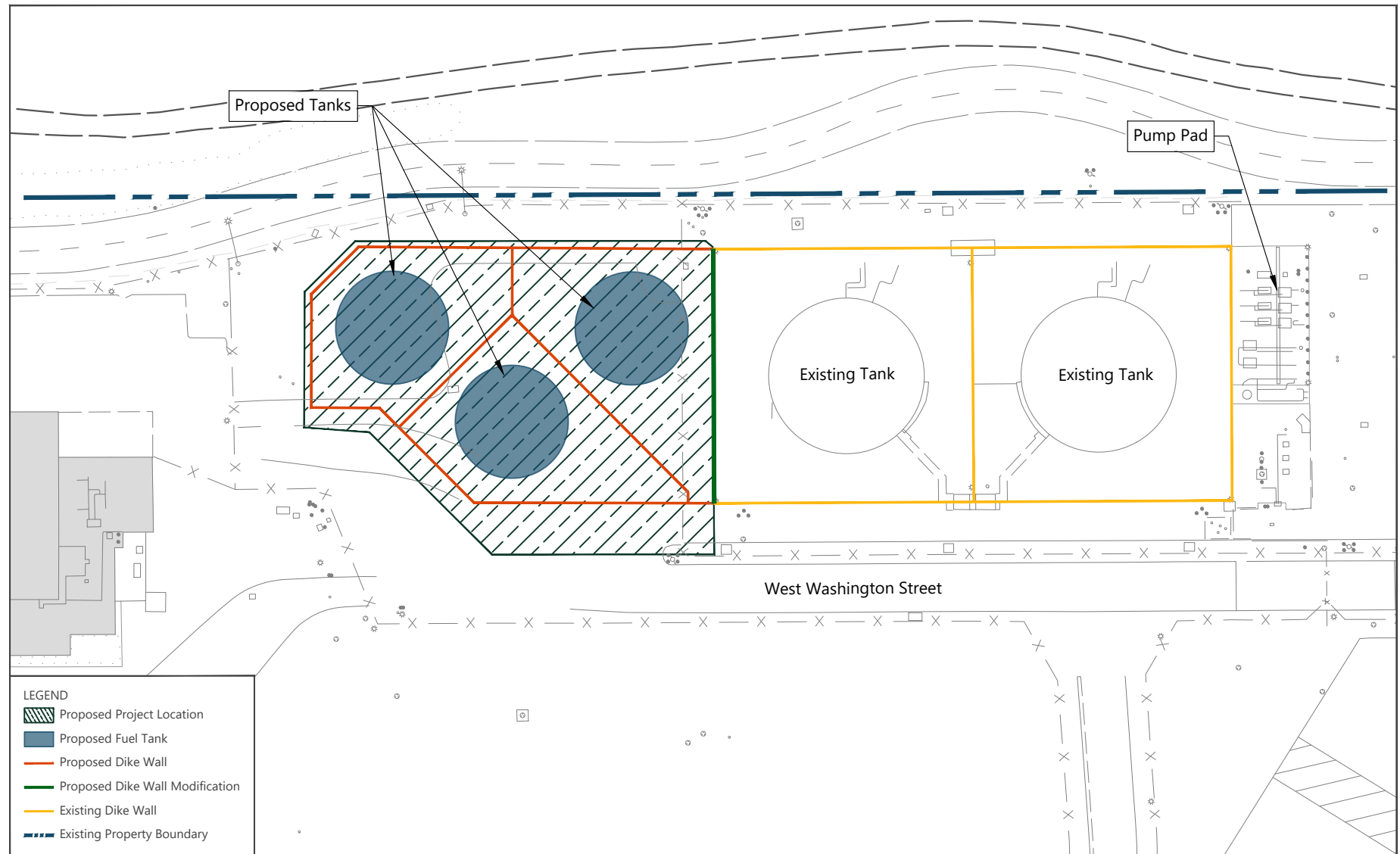


EXISTING FUEL FARM

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project\_20190319.dwg Layout: EIR 2-3 Plotted: Apr 18, 2019, 01:10PM

Additional Fuel Tanks Project

Draft EIR



SOURCE: San Diego International Airport, Airport Layout Plan, Updated October 2009 (basefile); Burns and McDonnell, December 2018 (additional storage tanks site plan).

**EXHIBIT 2-4**



**PROPOSED PROJECT SITE PLAN**

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project\_20190319.dwg Layout: EIR 2-4 Plotted: Apr 18, 2019, 01:12PM

Additional Fuel Tanks Project

Draft EIR

The estimated duration for construction would be approximately 17 months. Demolition and site preparation would begin with removal of asphalt, concrete, and debris from the proposed Project site. Existing utilities within the proposed Project site may need to be relocated and realigned to the periphery of the proposed Project site. Portions of the proposed Project site are susceptible to liquefaction and seismically induced settlement. Ground improvements of the upper soils would be required to mitigate long-term settlement and provide stability for the proposed tank foundations. Compaction grouting would be used to complete ground improvements. Compaction grouting comprises pressurized injection of grout mix columns into soils underlying a structure to displace and compact soils with columns of dense grout. Ground improvements would provide underlying stability for a cement fuel tank foundation 3.5 feet in depth and 61 feet in diameter for each tank. Approximately 2.5 feet of the foundation would be below grade.

Demolition, site preparation, and soil improvements would require the use of large, manned equipment such as cranes, dump trucks, hoists, cement mixing trucks, and backhoes, as well as small hand-held machinery such as pavement saws, small cement mixers, and jackhammers. A construction staging area adjacent to the site would be required to stage and store construction equipment and building materials.

Containment dike walls enclose both existing fuel tanks, as shown in Exhibit 2-3, and a single intermediate wall is erected between the existing fuel tanks. The existing containment dike area is sufficient to protect against the failure of one of the existing tanks at full volume as is required under Spill Prevention Control and Countermeasure (SPCC) regulations under Title 40 Code of Federal Regulations, Part 112.7 (c)<sup>9</sup> and NFPA Code 30.<sup>10</sup> However, per these regulations, an expanded containment dike area would be required to protect against failure of one of the proposed fuel tanks at full volume.

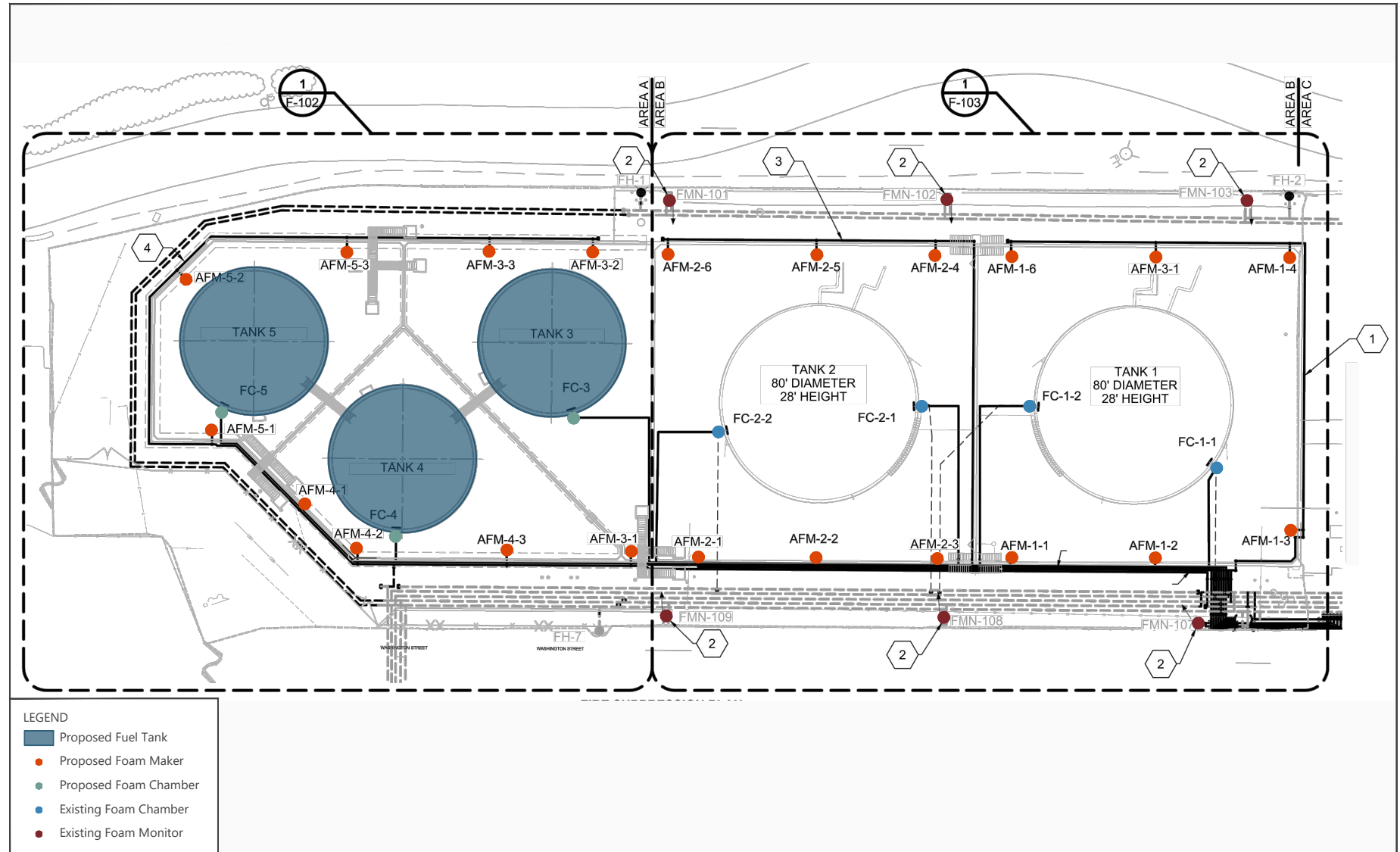
Accordingly, the proposed Project would include the construction of containment dike walls approximately 1-foot in width and 6 feet in height on the east, west, and south periphery of the proposed tanks. The proposed containment dike walls would be connected to the fuel farm's existing containment dike walls to create an expanded containment area. Secondary containment dike walls would also be constructed between the proposed tanks and the main dike wall. The secondary containment dike walls would be 8 inches thick and 3 feet above grade. The secondary containment would reduce risk to individual fuel tanks in the event of a catastrophic tank failure and to prevent minor spills from a tank from impacting adjacent tanks within the whole containment area. The dike walls would require 4.25-inch, below-grade footings for stability. The southernmost existing dike wall would be modified to serve as an intermediate containment dike wall for the northernmost proposed fuel tank. The remaining existing containment dike walls would not be modified. Upon completion, containment capacity for the new and existing tanks will exceed regulatory capacity requirements, containing an additional 775,000 gallons above what is required.

The proposed cylindrical tanks would be 58 feet high and 58 feet in diameter. Pending final design, each tank would include a set of safety stairs as well as tank-to-tank catwalks between the tanks to allow for conducting maintenance and operational functions. Construction of the proposed tanks would be completed by assembling pre-fabricated tank shell pieces in place and constructing ancillary tank equipment, including connecting pipelines. In addition to the proposed tanks, upgrades to the existing fire suppression system would be constructed as a part of the proposed Project. Twenty-one foam makers would be installed at the fuel farm; 6 surrounding each of the existing fuel tanks and 9 surrounding the proposed storage tanks as shown in **Exhibit 2-5**.

---

<sup>9</sup> Title 40, Code of Federal Regulations, Part 112.7, *General Requirements for Spill Prevention, Control, and Countermeasure Plans*.

<sup>10</sup> National Fire Protection Association, Code 30, *Flammable and Combustible Liquids Code*.



SOURCE: Burns and McDonnell, January 2019 (fire suppression system elements).

**EXHIBIT 2-5****PROPOSED FIRE SUPPRESSION SYSTEM ELEMENTS**

Drawing: P:\Project-Chicago\San Diego\San Fuel Farm\05-Drawings&amp;Models\San Fuel Tank Project\_20190319.dwg Layout: EIR 2-6 Plotted: Apr 18, 2019, 01:13PM

Additional Fuel Tanks Project

Draft EIR

One foam chamber would be installed on each of the proposed tanks and the nozzles on each of the existing foam monitors surrounding the existing fuel storage tanks would be replaced with a modern equivalent. Construction equipment would include delivery trucks, cranes, hoists, and small excavators. Smaller equipment including saws, welding machinery, and painting or architectural coating equipment would also be required during construction.

Given the adjacency of the proposed Project site to the airfield and the height of the proposed tanks, FAA approval of the proposed tanks and associated construction equipment heights was required to verify the proposed Project would not result in an obstruction to air navigation. The FAA made a final determination on September 3, 2019 that a maximum proposed tank height of 58 feet, as well as the use of a 100-foot crane during construction, would not result in an obstruction or other substantial adverse effect to air navigation or safety.

## **2.5 INTENDED USES OF THIS DRAFT EIR**

The content of this Draft EIR will be used by the SDCRAA to evaluate and consider the potential environmental impacts of the proposed Project. Certification of the EIR would complete the CEQA compliance requirements of the Lead Agency for the proposed Project.

The primary uses of this Draft EIR are to inform decision-makers and the public about the potentially significant environmental effects of the proposed Project and identify ways to avoid or reduce the significant environmental effects; to demonstrate to the public that the environment is being protected; and, to ensure that the planning and political processes reflect an understanding of the environmental impacts of the proposed Project.

### **2.5.1 PERMITS AND APPROVALS REQUIRED TO IMPLEMENT THE PROPOSED PROJECT**

Beyond the SDCRAA obligations to comply with the CEQA process, additional permits would be required to construct the proposed Project. The proposed Project is within the Coastal Zone and, therefore, would require a Coastal Development Permit. The Airport would consult with the Coastal Commission and comply with pertinent permitting requirements. Construction of the proposed Project would necessarily comply with California Building Standards Code requirements and would also require a Permit to Operate from the County of San Diego, the Certified Unified Program Agency for SDIA.

### **2.5.2 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS**

The proposed Project would be constructed to accommodate existing deficiencies with aircraft fuel reserves and to allow for the maintenance and rehabilitation of the existing tanks. Projects the SDCRAA is proposing as part of the 2018/2019 Airport Development Plan (ADP) are currently undergoing environmental review to comply with CEQA requirements. The proposed Project has independent utility; is required to increase aviation fuel storage at the Airport that meets industry fuel reserve standards for existing aircraft operations; would reduce risk of fuel shortages due to supply pipeline and fuel farm shutdowns; and would reduce the need to transport aviation fuel via tanker truck. The proposed Project would not result in an increase in passenger or aircraft capacity at SDIA. The proposed Project is not related to the 2018/2019 Draft ADP EIR or other ongoing environmental reviews for SDIA projects.

As discussed above, a Coastal Development Permit may be required to construct the proposed Project, which would require consultation with the Coastal Commission. The SDCRAA would be required to apply for a Permit to Operate from the County of San Diego, in its role as the Certified Unified Program Agency Permit for the Airport. Additionally, in response to the NOP for the preparation of an EIR for the proposed Project, a representative of the Viejas Band of Kumeyaay Indians requested that a tribal representative be on location during excavation activities.



## 3. ENVIRONMENTAL SETTING

### 3.1 INTRODUCTION

This section provides an overview of the existing land use, environmental, and development setting associated with the proposed Additional Fuel Tanks Project. In addition to providing an overview of the existing physical setting at and around the Project site, this section describes other development projects proposed at SDIA and in the nearby area that may, in combination with the proposed Project, result in cumulative impacts to the environment related to the environmental topics addressed in this Draft EIR. As documented in the Initial Study, the proposed Additional Fuel Tanks Project was determined to have the potential to cause significant impacts to three environmental resource categories: aesthetics, biological resources, and hazards and hazardous materials. Sections 3.3 and 3.4 provide descriptions of existing land use characteristics, as well as existing land use plans and policies, which define the existing environmental setting of the proposed Project.

### 3.2 EXISTING PHYSICAL CONDITIONS

#### 3.2.1 SAN DIEGO INTERNATIONAL AIRPORT

SDIA is located in the City of San Diego, west of I-5 and Pacific Highway, north of San Diego Bay and approximately 3 miles east of the Pacific Ocean. The Airport consists of airport terminal buildings; airport support buildings; parking facilities; the Air Operations Area (AOA); a general aviation support facility; and a rental car facility. The Airport terminal complex is located on the south side of the Airport property and comprises 3 buildings; Terminal 1 (T1), Terminal 2 East (T2-East), and Terminal 2 West (T2-West). Maintenance and freight forwarding cargo facilities are also located on the south side of the Airport east of the terminal complex.

The Airport's ground transportation system comprises local roads accommodating passenger and employee movement, as well as other maintenance, security, and logistical functions throughout the Airport. The ground transportation system is comprised mainly of surface roads; however, elevated access roadways are located adjacent to T2 and parallel to North Harbor Drive, on the southern boundary of the Airport. A three-level parking plaza and surface lot are situated south of the terminal complex to accommodate short-term parking. East of the terminal complex and terminal area short-term parking facilities lies the Airport's long-term parking lot.

On the north side of the east end of the AOA is the FBO, which accommodates general aviation operations at SDIA. West of the FBO, within the AOA, are SDIA cargo aircraft facilities. North of the FBO is the SDIA Rental Car Center, which comprises a four-level garage and rental car company lobby and adjacent surface rental car parking lots. As depicted in Exhibit 2-2 and described in Section 2.3, the existing fuel farm is located in the northeast portion of the Airport, west of the Rental Car Center. The fuel farm is adjacent to MCRD, which lies to the north and west; the FAA Airport Traffic Control Tower (ATCT) and SDIA Receiving and Distribution Center (RDC) to the east; and the SDIA ARFF facility to the west. The proposed Project site is completely within Airport property.

#### 3.2.2 NATURAL FEATURES

The Airport is necessarily constructed on a relatively flat expanse of land, underlaid by fill material, between the Point Loma peninsula to the west and hills of the Middletown and Mission Hills to the east. The average elevation

of SDIA is 10 to 15 feet above mean sea level. The topography of the Airport slopes gradually to the south and west towards San Diego Bay.<sup>1</sup> The Airport site is heavily developed and contains minimal natural landscape.

### 3.3 ENVIRONMENTAL SETTING

This section provides an overview of the existing environmental setting related to the proposed Project and the topical issues evaluated in Section 4.0, *Environmental Impacts*, of this Draft EIR. Additional information regarding existing conditions for these topics is provided in Section 4.0.

#### 3.3.1 AESTHETICS

The existing fuel farm consists of fuel tanks and the associated receiving and distribution mechanisms. Areas of the facility that do not contain systems and structures are generally paved and used for vehicle movement and airport ground operations. The facility is surrounded by airport uses to the east and south including the ATCT, the Airport's ARFF and the RDC, which all lie at the boundary of the secured AOA. A boundary fence, which separates the Airport property from the MCRD training ground, lies immediately west and north of the fuel farm.

SDIA is located in a developed, urban area adjacent to San Diego Bay. The local area contains uses that produce extensive light emissions from on- and off-Airport facilities and activities including the AOA and terminal buildings; parking lots; major arterial streets; industrial warehouses and elevated highways to the east; hotels, commercial, and recreational uses, including a marina and San Diego Bay, to the south and west; and the MCRD base facilities to the north. The Airport lies between San Diego Bay and communities situated east of the Airport, including the Midway-Pacific Highway area and Uptown (Middletown and Mission Hills), which are separated from the Airport and immediately surrounding uses by I-5 and Pacific Highway. Additional information regarding aesthetics of the proposed Project and surrounding area are contained in Section 4.2.

#### 3.3.2 BIOLOGICAL RESOURCES

The area including and surrounding the Airport is highly developed, which supports limited habitat, particularly for terrestrial species. No bodies of water, including wetlands, are located within Airport property.<sup>2</sup> Native vegetation within the Airport is nominal and much of the area devoid of buildings or other structures is paved. Land cover of unpaved areas of the AOA consists primarily of bare soil, gravel, and non-contiguous patches of low, sparse vegetation. However, due to the Airport's proximity to San Diego Bay and the Pacific Ocean, several avian species, including federal- and state-listed species, are known to occur or have the potential to occur at the Airport. Of the species found to occur or found to have the potential to occur, the California least tern has been recorded to inhabit areas of the AOA during the nesting season.<sup>3</sup>

The Airport is located with the California Coastal Zone (Coastal Zone) and is, therefore, subject to the regulation of the California Coastal Commission (Coastal Commission). Among other objectives, the California Coastal Act (CCA) was enacted to protect wildlife, marine fisheries, other ocean resources, and the natural environment.<sup>4</sup> The Coastal

---

<sup>1</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.1 - Aesthetics and Visual Resources*, September 2019.

<sup>2</sup> Wood Environment & Infrastructure Solutions, Inc., *Subject: Results of the Wetlands Assessment Survey at the San Diego International Airport, San Diego, California*, August 2019.

<sup>3</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 - Biological Resources*, September 2019.

<sup>4</sup> California Public Resources Code. Division 20, *California Coastal Act [30000-30013], Chapter 1. 30001*, February 14, 2019.

Zone contains unique biological resources, including habitat and species, which are regulated, in part, under the Coastal Zone Act.

### 3.3.3 HAZARDS AND HAZARDOUS MATERIALS

The type and utilization of hazardous materials and other regulated substances, including diesel fuel, compressed natural gas, aviation fuel, propane, and cleaning chemicals, at SDIA are consistent with other large hub airports. Aircraft and motor vehicle fueling, service, and repair, operation and maintenance of the airfield, terminal facilities, and support buildings and operation of aircraft all involve use of hazardous materials. The fuel farm necessarily involves the storage and conveyance of aviation fuel and use of smaller amounts of potentially hazardous substances associated with operation of the fuel facility as well.

The SDIA staff and tenants maintain emergency response and evacuation plans to minimize the potential for, and effects of, a hazardous material release during operations and during an emergency event. Existing access to the Airport, and the fuel farm specifically, is adequate for emergency response. Containment dike walls are erected around the existing tanks at the fuel farm to abate release of fuel into the surrounding area if either tank were to fail and a site-specific fire suppression system is maintained on the site to provide fire protection. The containment dike walls are approximately 50 feet from the property line of MCRD.

There are a number of sites and facilities located on, or adjacent to, the Airport that are known or have the potential to contain contaminated soil or groundwater; however, no reported environmental contamination or significant leaks have been recorded at the existing fuel farm.<sup>5</sup>

## 3.4 EXISTING LAND USE PLANS AND POLICIES

### 3.4.1 AIRPORT LAYOUT PLAN

The airport layout plan (ALP) serves as a critical planning tool that depicts both existing facilities and planned development for an airport. The ALP serves as a record of aeronautical operational requirements of an airport and existing and future land uses within the airport. The ALP is used by the FAA in its review of proposals that may affect the navigable airspace or other missions of the FAA.<sup>6</sup>

### 3.4.2 AIRPORT LAND USE COMPATIBILITY PLAN

The current Airport Land Use Compatibility Plan (ALUCP) was adopted in 2014 by the SDCRAA, acting as the Airport Land Use Commission (ALUC) and is consistent with the SDIA ALP. The purpose of an ALUCP is to promote compatibility between a given airport and existing and future land uses surrounding the airport for the orderly development of the Airport and environs and to protect public health, safety, and welfare in the surrounding area. California Public Utilities Code Section 21675(a) requires that an ALUCP be based on a long-range airport master plan or ALP. Additionally, the ALUC is required by State law to review proposed airport plans for consistency with the ALUCP.

---

<sup>5</sup> California State Water Resources Control Board, *GeoTracker* Website:

<http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=San+Diego> (accessed April 2019); California Department of Toxic Substances Control, *EnviroStor* Website: <https://www.envirostor.dtsc.ca.gov/public/> (accessed February 2019).

<sup>6</sup> U.S. Department of Transportation, Federal Aviation Administration, *Airport Compliance Manual – Order 5190.6B*, September 2009.

### 3.4.3 CALIFORNIA COASTAL ACT

The Coastal Commission, through the CCA, is responsible for the protection of regional, state, and national interests in assuring the maintenance of the long-term productivity and economic vitality of coastal resources necessary for the well-being of the people of the state; avoidance of long-term costs to the public and a diminished quality of life resulting from the misuse of coastal resources; and, continued state coastal planning and management of coastal resources. The entirety of SDIA lies within the Coastal Zone. Applicable development regulations of the CCA ensure development does not interfere with public access to the shoreline, recreational uses and scenic views are preserved, and biological habitats and water quality are protected. Under the provisions of the CCA, development projects located in the Coastal Zone must receive an additional level of review to assess potential impacts to coastal resources. Coastal Commission review is accommodated through application for a Coastal Development Permit from the Coastal Commission.

### 3.4.4 PORT MASTER PLAN

The Airport is depicted in the certified PMP as being within Planning District 2; however, the PMP and the associated land use designations are no longer applicable to the Airport and SDIA is not included in the PMPU planning analysis. Although the Airport is not under the jurisdiction of the Port District, the SDCRAA reviews and considers the PMP as the proposed Project would necessarily include work in the area covered by the PMP and PMPU.<sup>7</sup>

## 3.5 DEVELOPMENT SETTINGS

**Table 3-1** provides an overview of the past, present, and reasonably foreseeable projects, including other Airport development projects, that could, in conjunction with the proposed Project, result in cumulative impacts relative to aesthetics, biological resources, or hazards and hazardous materials. Projects selected for cumulative impacts consideration are those in proximity to the proposed Project area for which construction has been completed within the last three years, are currently under construction, or for which construction would commence within the next three years.

---

<sup>7</sup> The Port of San Diego is currently in the middle of an integrated planning process to prepare a comprehensive update to the PMP (referred to as the Port Master Plan Update or "PMPU"). A Discussion Draft of the PMPU was released for a 90-day public review period ending in July 2019. The Discussion Draft includes and addresses allowable uses and activities, future development, and management of water and land within the Port's jurisdiction on and around San Diego Bay. The PMPU is still being vetted through a public review process prior to Port Commissioners' acceptance. The April 2019 PMPU Discussion Draft is available online at <https://www.portofsandiego.org/waterfront-development/integrated-planning-port-master-plan-update>. Since the PMPU is still being vetted through a public review process prior to Port Commissioners' acceptance, the PMPU goals and policies that relate to the environmental topics addressed in Section 4.0 of this Draft EIR are not addressed in the impacts analyses in Section 4.0.

TABLE 3-1 (1 OF 2) PAST, PRESENT, AND REASONABLY FORESEEABLE PROJECTS

PROJECT NAME	PROJECT DESCRIPTION
<b>On-Airport Projects</b>	
<b>Past Projects</b>	
North Side Improvements	Construction of the Rental Car Center; construction of a 19,000 sf FBO building; and roadway improvements on the east side of the Airport. <i>2013-2016</i>
Taxiway B Object Free Area Improvement Project	Construction of a wider object-free area (OFA) adjacent to Taxiway B, at SDIA, to accommodate Group V aircraft on Taxiway B. Repositioning of existing service road, existing fence, and existing security gate adjacent to Taxiway B approximately 40 feet south of current alignment. <i>Completed 2018</i>
<b>Present Projects (Recently Completed or Approved)</b>	
Airport Support Facilities	The relocation or reconstruction of five existing Airport Support Facilities from 2018-2019 including the construction of a Facilities Management Department facility; Aircraft Fueling Operation facility; and an Airline Operations Facility; the relocation of AOA Gate P-18; modifications to the existing Rental Car Center bus parking facilities; and two new (replacement) solid waste/recycled materials facilities, including connections to the sanitary sewer for the disposal of lavatory waste (also referred to as a triturator). <i>Ongoing</i>
Terminal 2 Parking Plaza	Construction of a three-story Parking Plaza with approximately 2,900 parking stalls in front of Terminal 2. <i>2016-2018</i>
Federal Inspection Services (FIS) Improvements and Relocation at Terminal 2	Relocation of the existing FIS facility for international arrivals from Terminal 2-East to the newly completed Green Build portion of the existing Terminal 2-West, including approximately 40,000 square feet of new construction and approximately 85,000 square feet of modifications within the existing terminal. <i>2017-2018</i>
Palm Street Park	As part of the Airport's north side construction program, an observation park is being planned on a 0.9-acre remnant parcel at the corner of Palm Street and Admiral Boland Way. <i>To be determined.</i>
Aircraft Fuel Hydrant System	Installation of a fuel hydrant pit(s) at each gate along with the associated fuel pipeline network to improve safety and efficiency of aircraft refueling and reduce environmental effects from existing aircraft refueling operations. <i>December 2019-August 2020</i>
West Fuel Rack	Removal of existing fuel rack located near the Airport Administrative Offices building and construction of a new replacement fuel rack at the west end of the Airport. <i>2020-2021</i>
<b>Future Projects</b>	
Air Cargo Warehouse Facilities and Associated Improvements	Construction of air cargo facilities located parallel to and on the north side of Taxiway C. The facilities would include approximately 225,000 square feet of warehouse space for air cargo, and an aircraft parking apron with up to nine parking positions for cargo aircraft. All current and future cargo operations would be consolidated into the new cargo facilities. <i>Proposed Mid-2020-2021</i>
SAN Stormwater Capture and Reuse System	Construction of a large-scale multi-phase project intended to capture stormwater from a drainage area of approximately 200 acres. At final build-out, the total storage capacity of the SAN Stormwater Capture and Reuse System would be approximately 9.4 million gallons and allow for the capture and reuse (or infiltration) of approximately 43 million gallons of stormwater per year. The first phase, for the north side of Airport, was initiated in 2018. As part of the proposed SDIA ADP, an underground storage tank with approximately 3.4 million gallons of storage capacity, and two underground infiltration areas with an additional 3 million gallons temporary storage capacity would be constructed in the southern and eastern portions of SDIA. <i>2018 and ongoing; SDIA ADP component: approximately 2021-2026</i>
Airport Development Plan Phase I Demolition	Demolition of the following in preparation for the proposed ADP Phase 1 construction: Airport Administration Building; Facilities Management Department (FMD) Administration Building; a triturator and wash rack; a United Cargo Facility; a Southwest Cargo Facility; a consolidated air freight facility; the American Airlines maintenance facility; FMD workshops and maintenance shops; Terminal 1; on-Airport roadways; Taxiway B; employee and public parking lots; and portions of aircraft apron. <i>Proposed approximately 2021-2024</i>

TABLE 3-1 (2 OF 2) PAST, PRESENT, AND REASONABLY FORESEEABLE PROJECTS

PROJECT NAME	PROJECT DESCRIPTION
<b>On-Airport Future Projects Continued</b>	
New Airport Administration Building	Construct an approximately 150,000 square-foot SDIA administrative office building on the west side of the Airport, near the intersection of McCain Road and Airport Terminal Road proposed as part of the ADP. <i>Proposed approximately 2021-2024</i>
Central Utility Plant Expansion	Expansion of the existing Central Utility Plant (CUP) by approximately 12,000 square feet to increase the facility's capacity for providing heated and chilled water throughout the Airport as a part of the ADP. <i>Proposed approximately 2021-2024</i>
Taxiway A and Taxiway B Improvements/Relocation (Phase 1a)	This project would move the centerline of Taxiway B southward by 37.5 feet and construct a new Taxiway A north of the Terminal 1 Building proposed as a part of the ADP. <i>Proposed approximately 2021-2024</i>
Terminal 1 Access Loop and On-Airport Entry Roadways (Phase 1a)	Construction of an on-airport roadway surrounding the existing Terminal 1 Parking Lot including an on-airport entry roadway connecting to North Harbor Drive approximately 500 feet west of West Laurel Street proposed as a part of the ADP. <i>Proposed approximately 2021-2024</i>
Terminal 1 Parking Structure (Phase 1a)	Construction of the east side (Phase 1a) of a multi-level parking structure south of the Terminal 1 development. The east side development would include approximately 1,500,000 square feet of parking surface within a 5-story, 60-foot tall structure as a part of the ADP. <i>Proposed approximately 2021-2024</i>
Terminal 1 Replacement (Phase 1a)	Demolition of existing Terminal 1 building, cargo, airline support, and surface elements (parking lots, roadways) and construction of Phase 1a of the Terminal 1 replacement, comprising approximately 810,000 square-foot, 22-gate terminal building and remain-over-night aircraft parking, as a part of the ADP. <i>Proposed approximately 2021-2024</i>
<b>Off-Airport Projects</b>	
<b>Present Projects</b>	
City of San Diego Utilities Undergrounding Program	The City of San Diego through its Utilities Undergrounding Program is currently relocating approximately 15 miles of overhead utility lines underground throughout the city each year. In the vicinity of the proposed Project site, underground projects ongoing include Hancock Street and San Diego Avenue. <i>Ongoing</i>
<b>Future Projects</b>	
San Diego Unified Port District Master Plan Program	The San Diego Unified Port District Master Plan (PMP), current updates to which are in the draft Port Master Plan Update (PMPU) document, provides programmatic guidance regarding the protection and promotion of coastal development and coastal-related issues for land uses around the San Diego Bay. The PMP Program has identified conceptual roadway improvement; recreation; hotel; marine facility; and non-water-oriented commercial projects within the Harbor Island Planning District, which includes SDIA, and similar projects within the adjacent Shelter Island and Embarcadero Planning Districts. Conceptual Port improvement projects within vicinity of the proposed Project include narrowing Harbor Drive and improving bicycle and pedestrian pathways east of Harbor Island Drive and modification to Pacific Highway, east of the Airport. Additionally, up to 1,500 hotel rooms and restaurant and commercial space are proposed for the east side of Harbor Island and adjacent to Pacific Highway immediately east of the Airport.

SOURCE: San Diego County Regional Airport Authority; City of San Diego, "Capital Improvements Program". Available: <https://www.sandiego.gov/cip> (accessed August 2019); City of San Diego, "Utilities Undergrounding Program". Available: <https://www.sandiego.gov/undergrounding> (accessed August 2019).

## 4. ENVIRONMENTAL IMPACTS

### 4.1 INTRODUCTION

This section presents an assessment of the potential environmental impacts of the proposed Additional Fuel Tanks Project as described in Section 2.0, *Project Description*. This section further describes the physical environment within SDIA and immediately adjacent areas that may be affected by construction and operation of the proposed Project; the potential impacts to that physical environment; and the measures proposed to mitigate those impacts, as required.

The following topics are addressed in this section:

- Aesthetics
- Biological Resources
- Hazards and Hazardous Materials

#### 4.1.1 ORGANIZATION

Each of the three environmental resource categories addressed in this section are discussed individually in sections below using a common organization. Sections are numbered 4.2 through 4.4. Sections are divided into subsections to simplify and clarify the discussion.

Within each environmental topic section, discussion of the following topics is provided:

- The **Introduction** briefly describes the issues addressed in the analysis and identifies related topics. The Introduction also identifies any specific subject within the topic that is not being addressed as part of the proposed Project EIR and justification for the omission. In many cases, specific issues were evaluated, and impacts determined to be less than significant, in the SDIA Additional Fuel Tanks Project Initial Study, which is included as **Appendix A** of this EIR. In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, further analysis of specific issue areas where impacts were determined to be less than significant in the Initial Study is not required and is not provided in this EIR.
- The **Methodology** describes how analysis of the issue was approached, including explanations of any assumptions, equations, or calculations; identification of information sources used for the analysis; and delineation of the study area considered for each environmental discipline.
- The **Existing Conditions** discusses the baseline conditions for the environmental factors in the study area, including relevant activities, facilities, and regulations. The environmental baseline is described below in Section 4.1.2.
- The **Thresholds of Significance** are quantitative or qualitative measures used to determine whether a significant environmental impact would occur as a result of the proposed Project. This section identifies the origins of the thresholds of significance used in the analysis. In general, and unless otherwise noted, the thresholds of



significance used in the analysis of proposed Project impacts reflect guidance provided in Appendix G of the State *CEQA Guidelines*.<sup>1</sup>

- The **Impacts Analysis** section presents the analysis of impacts at a project-level for the buildout horizon year of 2021. Impacts were compared to the thresholds of significance to determine whether they would be significant or less than significant per CEQA Statute and Guidelines. For purposes of determining significance, potential impacts were compared to the environmental baseline conditions.
- **Significance of Impacts** discusses whether the impacts identified in the Impacts Analysis are determined likely to result in an impact and, if so, whether the impact would have the potential to be significant.
- **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agency to reduce or avoid the significant impacts identified in the analysis. This section identifies Project-specific mitigation measures proposed to address significant impacts that would occur with implementation of the Project. In accordance with the requirements of CEQA, a mitigation monitoring and reporting program (MMRP) would be adopted as part of the proposed Project approvals, to ensure that implementation of mitigation measures is properly monitored and documented.
- Where necessary, **Level of Significance After Mitigation** is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant.

#### 4.1.2 ENVIRONMENTAL BASELINE

Section 15125 of the State CEQA Guidelines requires that an EIR describe the physical environmental conditions in the vicinity of a proposed project and states that the “environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” Per Section 15125(a)(1), “Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published...” The NOP for this EIR was published on November 28, 2018. In accordance with the provisions of CEQA, 2018 is the baseline year for characterizing existing conditions in the environmental analysis, unless otherwise specifically noted.

### 4.2 AESTHETICS

This section evaluates the impacts of the proposed Project on aesthetics and visual character; specifically, impacts to scenic vistas and the character and quality of the proposed Project site and its surroundings. The evaluation of aesthetics and visual character impacts considers the existing visual character of the Project site and surrounding area, as well as how implementation of the proposed Project would affect this visual character. Aesthetics are an element of the environment protected under the CCA; as such, aesthetics, as they pertain specifically to Coastal Zone resources will also be evaluated.

Comments in response to the NOP specific to potential impacts related to aesthetics were received from the following:

- Private Citizens – Noted that the height of the proposed Additional Fuel Tanks exceed the Coastal Commission

---

<sup>1</sup> State of California, *Guidelines for California Environmental Quality Act (State CEQA Guidelines)*, California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.



height limit in the City of San Diego Local Coastal Program, but not within state standards, and that there could be significant aesthetics impacts.

#### 4.2.1 METHODOLOGY

The term "aesthetics" generally refers to the perceived visual impression of an area, such as scenic vistas, open space, or architecture. The aesthetic value of an area is a measure of its visual character and visual quality combined with viewer response. Aesthetics may be affected by the components of a project (e.g., buildings constructed at a height that obstructs views, modification of topography, and development of open space).

This analysis is based on a review of the regulatory documents governing the proposed Project and the areas adjacent to it. Additionally, the analysis includes: (1) reconnaissance of the proposed Project site and the surrounding communities in April 2019; (2) identification and documentation of key views; and (3) review of the Project description and preliminary design. More specifically, in regard to views, several long- and short-range views were selected for the visual assessment based on representative viewer groups, public viewing locations, and public policies, such as policies related to view corridors identified in regulatory/planning documents. **Exhibit 4-1** details the location of the four viewpoints chosen for a visual simulation analysis, while **Exhibits 4-2** through **4-5** show before and after pictures and renderings for each of the view shed.

#### 4.2.2 EXISTING CONDITIONS

##### 4.2.2.1 REGULATORY FRAMEWORK

###### **State**

The entirety of SDIA is within the Coastal Zone and is subject to review for impacts to the Coastal Zone per CCA regulations. Section 170060[c] of the SDCRAA Act requires the Authority to submit any required permitting application pursuant to the CCA, and in accordance with applicable laws, for improvements upon coastal lands under the control of the Authority through a lease. Section 30251, Scenic and Visual Quality, of the CAA provides criteria for determining potential for aesthetic impacts of a proposed project, as follows:

The scenic and visual qualities of the coastal areas shall be considered and protected as a resource of public importance. Permitted development [in the Coastal Zone] shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of the surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

###### **Local**

SDIA is located near or adjacent to several planning areas with specific policies regarding aesthetics of the San Diego Bay, the City of San Diego, and the associated public viewsheds and urban design guidelines. The following local plan policies and guidelines are applicable to the proposed Project site:



SOURCE: San Diego International Airport, Airport Layout Plan, Updated October 2009 (boundary); Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, December 2015 (aerial imagery for visual reference only - may not be to scale); Ricondo (photo locations).

**EXHIBIT 4-1****PROPOSED PROJECT RENDERING VIEWPOINTS**

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project\_Photo Locations\_20190418.dwg Layout: 4-1 Plotted: Apr 18, 2019, 01:08PM





SOURCE: JBG Environmental Consulting, 2019; Ricondo & Associates, Inc., 2019.

**EXHIBIT 4-2**

**PROPOSED PROJECT RENDERING VIEWPOINT 1**



**BEFORE****AFTER**

SOURCE: JBG Environmental Consulting, 2019; Ricondo &amp; Associates, Inc., 2019.

**EXHIBIT 4-3****PROPOSED PROJECT RENDERING VIEWPOINT 2**





SOURCE: JBG Environmental Consulting, 2019; Ricondo & Associates, Inc., 2019.

**EXHIBIT 4-4**

PROPOSED PROJECT RENDERING VIEWPOINT 3



**BEFORE****AFTER**

SOURCE: JBG Environmental Consulting, 2019; Ricondo &amp; Associates, Inc., 2019.

**EXHIBIT 4-5****PROPOSED PROJECT RENDERING VIEWPOINT 4**

- **San Diego Unified Port District Port Master Plan (PMP)** – The Airport was formerly operated by the Port District. SDIA is now planned and operated by SDCRAA, a State-created agency established in 2003. The PMP was originally adopted in 1980 and subsequently certified by the Coastal Commission in 1981 as required by the CCA. The PMP divided tidelands in the Port District’s jurisdiction into ten Planning Districts and further divides each Planning District into Planning sub-areas to facilitate land use planning.<sup>2</sup> SDIA is located with the Port District’s Planning District 2, the Harbor Island/Lindbergh Field Planning sub-area; however, the Airport is located on State tidelands leased from the Port District and is not subject to the PMP.

The PMP identifies two Planning Goals related to aesthetics that are applicable to the proposed Project; which include:

- Goal II: The Port District, as trustee for the people of the State of California, will administer the tidelands so as to provide the greatest economic, social, and aesthetic benefits to present and future generations.
- Goal VIII: The Port District will enhance and maintain the Bay and tidelands as an attractive physical and biological entity.

Policies associated with the Planning Goals include:

- Views should be enhanced through view corridors, the preservation of panoramas, accentuation of vistas, and shielding of the incongruous and inconsistent.
- Establish guidelines and standards facilitating the retention and development of an aesthetically pleasing tideland environment free of noxious odors, excessive noise, and hazards to the health and welfare of the people of California.

As noted previously in Section 3.4.4, the Port of San Diego is currently in the middle of an integrated planning process to prepare a comprehensive update to the PMP (referred to as the Port Master Plan Update or “PMPU”). A Discussion Draft of the PMPU was released for a 90-day public review period ending in July 2019. The Discussion Draft includes and addresses allowable uses and activities, future development, and management of water and land within the Port’s jurisdiction on and around San Diego Bay.

The stated intent of the PMPU Discussion Draft is:

...to protect and promote coastal-dependent and coastal-related uses, allow for and encourage a diverse range of uses around San Diego Bay (Bay), and provide and ensure coastal access to explore and enjoy areas within the San Diego Unified Port District’s (District) jurisdiction.<sup>3</sup>

The PMPU Discussion Draft includes goals and policies to guide activities on the Port’s tidelands in the areas of ecology, economics, environmental justice, safety and resiliency, mobility, and water and land use. Since the PMPU is still being vetted through a public review process prior to Port Commissioners’ acceptance, the PMPU goals and policies related to aesthetics and visual resources were not addressed in the impacts analyses below.

- **City of San Diego Community Plans and Policies** - The City of San Diego’s General Plan recognizes areas of common historical development, land use, and physical attributes within the City to define sub-areas (or

<sup>2</sup> Port of San Diego, *Port Master Plan*, 2017.

<sup>3</sup> Port of San Diego, *Port Master Plan - Discussion Draft*, April 2019. Available: <https://www.portofsandiego.org/waterfront-development/integrated-planning-port-master-plan-update>.

Communities), for which a unique Community Plan has been developed. Each Community Plan addresses all aspects of community development including long-range development guidance and implementation strategies. Due to the size and location of the proposed Project, view of the project site from within two Community Planning Areas were identified as having the potential to be impacted by the proposed Project; Midway-Pacific Highway and Uptown.

- **Midway-Pacific Highway Community Plan** - The Midway-Pacific Highway Plan sub-area is located immediately north of the Airport and includes the MCRD. Portions of the Midway-Pacific Highway Plan Community are located within the Coastal Zone and the Local Coastal Program elements associated with the Community, including view preservation, are included in the Community Plan.<sup>4</sup> Although the Airport is not subject to City of San Diego land use policies, the aesthetics-related policies in the Midway-Pacific Highway Plan pertaining to the proposed Project include:
  - LU-4.82 - Provide and emphasize physical access to San Diego Bay via Sassafras, Palm, and Laurel Streets, and maintain bay views from the public right-of-way at Kettner Boulevard and Redwood, Palm, and Olive Streets as feasible.
  - LU-4.84 - Support the development of an Intermodal Transit Center as a major transportation hub for the region. (E) Provide view opportunities to San Diego Bay where feasible.
- **Uptown Community Plan** - The Uptown Community Planning Area (CPA) is located north and east of the SDIA property on the east side of the I-5 Freeway. The Uptown Community Plan identifies that the prominent topography of the CPA affords scenic views “of Downtown, the ocean, canyons, the harbor, Coronado, and Point Loma.”<sup>5</sup> The Airport is within the viewshed to San Diego Bay and the Pacific Ocean from points in the Uptown CPA. The neighborhoods affording viewpoints which include the Airport property are Middletown and Mission Hills. Uptown Community Plan policies providing for the preservation of views include:
  - UD-1.2 - Preserve and enhance viewsheds and view corridors from public streets and vantage points as shown on Figure 4-3 Canyons and Views.
  - CE-2.15 - Public views from identified vantage points, to and from community landmarks and scenic vistas shall be retained and enhanced as a public resource.

#### 4.2.2.2 AESTHETIC RESOURCES

SDIA is located between the Point Loma peninsula to the west, Uptown to the east, the north extents of Downtown San Diego to the south east, and Harbor Island and San Diego Bay to the south. The fuel farm is situated in the northernmost portion of the Airport surrounded by the ATCT, the RDC, and the ARFF, which also include surface parking areas and are adjacent to the AOA. The fuel farm consists of two existing 1 million-gallon tanks, tanker truck fuel loading pads and infrastructure, ancillary fuel farm structures, and a single-story, 2,400 square foot personnel office building. The areas surrounding the fuel farm on which there are no structural improvements are generally

<sup>4</sup> City of San Diego, *Midway-Pacific Highway Community Plan*, September 17, 2018. Available:

[https://www.sandiego.gov/sites/default/files/midway\\_-\\_pacific\\_highway\\_community\\_plan\\_sept\\_2018\\_0.pdf](https://www.sandiego.gov/sites/default/files/midway_-_pacific_highway_community_plan_sept_2018_0.pdf).

<sup>5</sup> City of San Diego, *Uptown Community Plan*, November 2016, as amended June 12, 2018. Available:

<https://www.sandiego.gov/planning/community/profiles>.



paved roadways, surface parking, or AOA. Security fencing is erected along the boundary of the AOA, on Airport property, and along the boundary between Airport property and the MCRD, to the north.

Airport and tenant staff, passengers, and the general public in proximity to the Airport would have views that include the fuel farm. Unobstructed views to the fuel farm exist from the ATCT, ARFF, and RDC; however, public activity in the area is nominal as none of the aforementioned facilities are publicly accessible. Elements of the fuel farm, specifically the existing fuel storage tanks, are visible from the MCRD property; however, views from MCRD are not considered public views. A security fence and screen are located between the boundary of the Airport and MCRD. The nearest regularly occupied MCRD buildings to the fuel farm are more than 800 linear feet west of the boundary fence.

The proposed Project site is also visible from portions of North Harbor Drive to the south, portions of Pacific Highway and I-5 to the east, as well as from elevated areas within the Mission Hills community to the east beyond I-5.

Existing visual resources identified in state and local planning documents that have the potential to be affected by the proposed Project include San Diego Bay and the Pacific Ocean. Several long- and short-range views were selected for the visual assessment based on representative viewer groups, public viewing locations, and public policies, such as policies related to view corridors identified in regulatory/planning documents (see Section 4.2.2.1 above). These key public view locations represent typical viewpoints of the proposed Project site (existing as of April 2019). A total of 4 key view locations were identified. These viewpoints are located at pedestrian access points and public roadways, including I-5. Exhibit 4-1 identifies the location of these key views. Each of these key views is depicted, on Exhibits 4-2 through 4-5.

### 4.2.3 THRESHOLDS OF SIGNIFICANCE

As described in the Initial Study, under State CEQA Guidelines Appendix G, a project has the potential to result in significant aesthetics impacts if the project would:

- a. Have a substantial adverse effect on a scenic vista; or
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or
- c. Conflict with applicable zoning and other regulations governing scenic quality; or
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Threshold items "a" and "c" are relevant to the proposed Project and impacts associated with the criteria will be discussed further in this section. Threshold items "b" and "d" were found to have no impact (see the Initial Study in Appendix A); as such they are not discussed further.

The City of San Diego Development Services Department has also prepared a set of Significance Determination Thresholds (July 2016) for CEQA environmental evaluations. Although SDCRAA is not subject to the City's significance thresholds, this Draft EIR considers those thresholds because the proposed Project site is directly adjacent to communities within the City of San Diego. The City thresholds document does not include a category for aesthetics; however, the document does define criteria for Visual Effects and Neighborhood Character.<sup>6</sup> Specific

---

<sup>6</sup> City of San Diego Development Services Department, *California Environmental Quality Act Significance Determination Thresholds*, July 2016.

thresholds described therein, which are applicable to the proposed Project, are categorized as views, and neighborhood character/architecture; which are described as follows:

■ Views

- a. The project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program. Minor view blockages would not be considered to meet this condition. In order to determine whether this condition has been met, consider the level of effort required by the viewer to retain the view;
- b. The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan. Unless the project is moderate to large in scale, condition "c" would typically have to be met for view blockage to be considered substantial;
- c. The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area;
- d. The project would have a cumulative effect by opening up a new area for development, which will ultimately cause "extensive" view blockage. (Cumulative effects are usually considered significant for a community plan analysis, but not necessarily for individual projects. Project level mitigation should be identified at the community plan level). View blockage would be considered "extensive" when the overall scenic quality of a visual resource is changed; for example, from an essentially natural view to a largely manufactured appearance.

■ Neighborhood Character/Architecture

- a. The project exceeds the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin;
- b. The project would have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (e.g., Gaslamp Quarter, Old Town);
- c. The project would result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan or local coastal program;
- d. The project is located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections;
- e. The project would have a cumulative effect by opening up a new area for development or changing the overall character of the area (e.g., rural to urban, single-family to multi-family). As with views, cumulative neighborhood character effects are usually considered significant for a community plan analysis, but not necessarily for individual projects. Project level mitigation should be identified at the community plan level. Analysts should also evaluate the potential for a project to initiate a cumulative effect by building structures that substantially differ from the character of the vicinity through height, bulk, scale, type of use, etc., when it is reasonably foreseeable that other such changes in neighborhood character will follow.

The impact analysis in the next section considers the potential effects of the proposed Project per CEQA Guidelines, Appendix G, Section I Thresholds “a” and “c” and City of San Diego Thresholds 1 (Views), and 2 (Neighborhood Character/Architecture).

#### **4.2.4 IMPACT ANALYSIS**

The short-term impacts (those occurring during construction) and long-term impacts (those occurring from the implementation of the proposed Project) that could result from the proposed Project are discussed below.

##### **4.2.4.1 SHORT-TERM IMPACTS**

Construction of the proposed Project would create temporary changes in views of the Airport at and in proximity to the fuel farm. The SDCRAA expects construction of the proposed Project would be completed within 17 months. Ground-level views of construction would primarily be visible from areas immediately adjacent to the site on Airport property, terminal buildings, parking garages, and elevated areas of the Uptown Community. Equipment such as cranes, lifts, and hoists would be visible from areas immediately adjacent to the Project site, including the MCRD; areas of the Uptown and Midway-Pacific Highway Communities; Airport facilities; and I-5, Pacific Highway, and the local surface transportation network. The presence of construction equipment at the fuel farm would create visual changes in the immediate area; however, the equipment would be consistent in scale and character with surrounding uses.

##### **4.2.4.2 LONG-TERM IMPACTS**

Following construction of the proposed Project, views of the Airport’s fuel farm would differ from the existing setting. Three additional 58-foot tall fuel storage tanks would be visible from the immediate Project site and within viewsheds beyond the Airport property (see Exhibits 4-2 through 4-5). As shown on these exhibits, while noticeable from public viewpoints beyond Airport property, the proposed Additional Fuel Tanks would be consistent with the existing use and would not degrade any views of scenic resources (i.e., from San Diego Bay and the Pacific Ocean) or result in visual character different than the existing fuel farm.

#### **4.2.5 SIGNIFICANCE OF IMPACTS**

##### **4.2.5.1 SIGNIFICANCE OF VISUAL IMPACTS**

As described in Section 4.2.2, direct, ground-level viewpoints to the proposed Project site are minimal and are restricted to adjacent Airport facilities and the MCRD. Views to the fuel farm are available from the MCRD; however, the existing views are partially obscured by an existing boundary fence and regularly occupied MCRD buildings are more than 800 feet away from the proposed Project site. Construction equipment would be visible from areas within and immediately adjacent to the Airport, certain areas of the Uptown and Midway-Pacific Highway Communities, I-5, the Pacific Highway, and the local surface transportation network and surface parking lots. However, the limited duration of construction, size of the proposed construction area, and limited amount of construction equipment would neither substantially change the visual character of the Airport, nor degrade the visual quality of any scenic vistas or other aesthetic resources to or from the proposed Project site. The aesthetic changes at and within the area immediately surrounding the fuel farm resulting from the construction of the proposed Project would be less than significant. Additionally, aesthetic changes at the fuel farm resulting from construction of the proposed Project would be consistent with surrounding uses and Airport activities and, therefore, would result in a less-than-significant impact to viewsheds of scenic resources and as related to neighborhood character.

The proposed fuel tanks would be constructed immediately south of the existing fuel tanks at the fuel farm. Dimensions of the proposed fuel tanks would be 58 feet in height and 58 feet in diameter. The proposed fuel tanks are subject to Coastal Commission review; however, the height of the proposed fuel tanks is consistent with the visual character of the existing fuel farm and nearby Airport development and the fuel farm is an existing use. FAA approval of the proposed tanks and associated construction equipment heights was required to verify the proposed Project would not result in an obstruction to air navigation. The FAA made a final determination on September 3, 2019 that a maximum proposed tank height of 58 feet, as well as the use of a 100-foot crane during construction, would not result in an obstruction or other substantial adverse effect to air navigation or safety.

The City of San Diego zoning map recognizes SDIA property as a "Reserved" land use, as the Airport is not subject to City zoning regulations. However, land uses adjacent to the proposed Project site subject to City zoning regulations comprise commercial, industrial, mixed-use, and parcels of land that do not currently have a zoning designation.<sup>7</sup>

Although viewsheds from public areas at or near viewsheds in the Uptown area and along North Harbor Drive are considered sensitive, the visual impact of the proposed tanks is considered to be nominal. Views to the Airport from the MCRD are not considered to have valuable visual character or high visual quality. Further, such views from MCRD are not considered public views. As shown on Exhibits 4-2 through 4-5, views of the proposed Project site from public view corridors both along North Harbor Drive and from the Uptown area do exist. While noticeable from these viewsheds, the proposed Additional Fuel Tanks would neither substantially obstruct any existing views to the San Diego Bay or the Pacific Ocean. Although portions of the Airport can be seen from many vantage points in the Midway-Pacific Highway, Peninsula, or Uptown Community Plan CPA, the existing fuel tanks do not create or obscure a unique viewshed or contribute greatly to the character of viewsheds surrounding and including the Airport. The proposed Additional Fuel Tanks would be consistent in size with the existing fuel tanks and would also be consistent with the character of the Airport land use and surrounding urbanized area. Full views of the fuel farm can be seen by the surrounding Airport uses; however, Airport, vendor, and tenant staff are not considered to be sensitive viewers. Therefore, visual impacts associated with the ongoing operation of the proposed Additional Fuel Tanks would be less than significant based on the CEQA Guidelines Appendix G Aesthetic Impacts ("a" and "c") criteria as well as the City of San Diego threshold criteria for Impact Nos. 1 and 2.

#### 4.2.6 MITIGATION MEASURES

No mitigation is required for construction or operation of the proposed Project. The proposed Project would result in a less than significant impact for aesthetics during construction and operation.

### 4.3 BIOLOGICAL RESOURCES

This section analyzes the proposed Project's impacts on biological resources, including impacts from both construction and operational activities.

Comments in response to the NOP specific to potential impacts related to biological resources were received from the following:

---

<sup>7</sup> City of San Diego, *Zoning Grid Map* - <https://www.sandiego.gov/development-services/zoning-maps/grid-map> (accessed April 2019).

- San Diego Unified Port District - The Port District noted that the proposed Additional Fuel Tanks could be used as perches for predatory birds and also requested the Draft EIR provide analysis on impacts of the proposed Project on the California least tern during construction activities.
- Private Citizen – Suggested that the SDCRAA consider sea level rise and the associated increase in risk a larger fuel storage facility may have on biological and water resources due to the effects of sea level rise.

### 4.3.1 METHODOLOGY

Impacts to biotic communities and threatened and endangered species at SDIA were assessed through a review of previous documents (e.g., the 2019 ADP Recirculated Draft EIR, California least tern nesting records, Biological Opinion [BO], and assessment of the potential for SDIA to support vegetation communities/habitat), as well as a biological resources survey conducted in March 2018 of the California least tern nesting areas (“ovals”) at the southeast portion of SDIA to determine the potential for the presence of sensitive plant species. The majority of SDIA is developed or highly disturbed and the fuel farm is located in an isolated area of the Airport; however, the Airport supports a breeding colony of the California least tern and is located within the California Coastal Zone. Therefore, the analysis on whether the proposed Project would result in impacts to biological resources is focused on the California least tern nesting area ovals and applicable elements of the CCA.

### 4.3.2 EXISTING CONDITIONS

#### 4.3.2.1 REGULATORY FRAMEWORK

##### **Federal**

**Clean Water Act** - The federal Water Pollution Control Act Amendments of 1972 (33 United States Code [U.S.C.] 1251–1376), as amended by the Water Quality Act of 1987, and better known as the Clean Water Act (CWA), is the major federal legislation governing water quality. The purpose of the federal CWA is to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” Dredging and discharges of fill material into waters of the U.S. are regulated under CWA Section 404. The proposed Project includes no such work. Consequently, the proposed Project does not include an application for a CWA Section 404 permit. Discharges of stormwater runoff into the waters of the U.S. are regulated under CWA Section 402. Stormwater runoff from the proposed Project would discharge into the San Diego Bay. Consequently, the proposed Project is subject to CWA Section 402, the NPDES permit requirements derived from CWA Section 402, and the SAN Stormwater Management Plan (SWMP) developed in compliance with the NPDES permits applicable to the Airport.

**Federal Endangered Species Act** - The federal Endangered Species Act (ESA)<sup>8</sup> protects plants and wildlife that are listed as endangered or threatened by the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS)<sup>9</sup>. Section 9 of the ESA prohibits the taking of endangered wildlife, where taking is defined as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct” (16 U.S.C. Section 1532[19]). Federal regulations further define the terms “harm” and “harass” as follows: “Harass” means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns, including breeding, feeding, or sheltering;

<sup>8</sup> 16 U.S. Code, Sections 1531-1544, as amended, *Endangered Species Act of 1973*.

<sup>9</sup> “Endangered” species are those in danger of extinction throughout all or a significant portion of its range. “Threatened” species are those likely to become endangered within the foreseeable future.

"Harm" means an act that actually kills or injures wildlife, and may include significant habitat modification or degradation (50 Code of Federal Regulations [CFR] 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land, as well as removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law. Under Section 7 of the ESA, federal agencies are required to consult with the USFWS or NMFS if their actions, including permit approvals or funding, may adversely affect an endangered or threatened species (including plants) or its critical habitat. Consultation may follow an informal, or a formal process. In cases where the federal agency determines its action may affect, but would be unlikely to adversely affect, a federally listed species, the agency informally consults with the USFWS and/or NMFS. This informal consultation typically involves incorporating measures intended to ensure effects would not be adverse. Concurrence from the USFWS and/or NMFS concludes the informal consultation process. Without such concurrence, the federal agency formally consults with resource agencies to ensure full compliance with the ESA. Through formal consultation and the issuance of a BO, the USFWS or NMFS may issue an incidental take permit authorizing take of the species that is incidental to an otherwise lawful activity, provided the action will not jeopardize the continued existence of the species.

**Migratory Bird Treaty Act** - The Migratory Bird Treaty Act (MBTA) prohibits take of birds listed under the MBTA. Birds protected under the MBTA are listed under 50 CFR Section 10.13. The list includes nearly all native birds. Under the MBTA, take means "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect." (50 CFR Section 10.12).

**FAA Advisory Circular No. 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports** - Advisory Circular (AC) 150/5200-33B provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports.<sup>10</sup> It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants. The AC provides guidance regarding land uses and habitat near airports and identifies management techniques that airport operators can implement to minimize the risk of wildlife and aircraft interactions.

## State

**California Coastal Act** - The CCA recognizes California ports, harbors, and coastline beaches as primary economic and coastal resources and as essential elements of the national maritime industry. The CCA directs that, where feasible, decisions to undertake specific development projects must consider alternative locations and designs to minimize any adverse environmental impacts to coastal resources. The CCA is implemented by the Coastal Commission and via Local Coastal Program agencies where applicable. Additional description of the CCA and its applicability through the Local Coastal Program is provided below.

The CCA contains policy to protect Environmentally Sensitive Habitat Areas (ESHA), including various types of wetlands, riparian areas, native coastal grasslands, and woodlands, and other natural resources in the Coastal Zone. Relevant to the proposed Project site, Article 4. Marine Environment, of Chapter 3 of the CCA, specifies development requirements and procedures which project applicants must meet to obtain a Coastal Development Permit.<sup>11</sup> SDIA

<sup>10</sup> U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports*, 2007.

<sup>11</sup> State of California, Public Resource Code, Division 20, *California Coastal Act [30000-30900], Chapter 3. Coastal Resource Planning and Management Policies [30200-30265.5], Article 4. Marine Environment [30230-30236]*, February 15, 2019.

is entirely within the California Coastal Zone and contains Environmentally Sensitive Areas as defined by Section 30107.5 of the Coastal Zone Act.

Section 30605 of the Coastal Zone Act requires any agency proposing a public works project to provide data showing consistency with a certified public works plan or long-range development plan. The 2008 San Diego International Airport Master Plan is the current approved long-range development plan. The proposed Project is consistent with the Airport Master Plan as the Additional Fuel Tanks are proposed to accommodate existing airport operations.

**California Endangered Species Act** - The California Endangered Species Act (CESA) prohibits the taking, importation, or sale of state-listed endangered or threatened species except in compliance with permits or conditions specified in the CESA.<sup>12</sup> The CESA also authorizes the California Department of Fish and Wildlife (CDFW) to issue permits for incidental take of endangered or threatened species by general development activities, provided that a proposed project will not jeopardize the continued existence of such species and that any of the project's negative effects on those species will be minimized and fully mitigated. CESA authorizes CDFW to enter into a memorandum of understanding with individuals, public agencies, universities, zoological gardens, and scientific or educational institutions to import, export, take, or possess species for scientific, educational, or management purposes.

**California Native Plant Protection Act** - The California Native Plant Protection Act (NPPA) includes measures to preserve, protect, and enhance endangered and rare native plants.<sup>13</sup> The list of native plants afforded protection by NPPA includes those listed as endangered and threatened under CESA, and the NPPA definitions of endangered and rare differ from those contained in CESA. However, under California Fish and Game Code Section 2062, any plant species determined by the California Fish and Game Commission (Commission) as "endangered" on or before January 1, 1985 is an endangered species under CESA and under Section 2067 any plant species determined by the Commission as "rare" is a "threatened species" under CESA. The NPPA specifies that no person shall import into California, or take, possess, or sell within California any endangered or rare native plant, except in compliance with provisions of NPPA.<sup>14</sup> Individual landowners who have been notified by CDFW of the presence of a rare or endangered plant are required to notify CDFW at least 10 days in advance of changing land uses to allow CDFW to salvage any endangered or rare native plant material.<sup>15</sup>

**California Fish and Game Code, Sections 3503 and 3513** - The California Fish and Game Code also prohibits the destruction of bird nests and eggs (Section 3503), as well as the "take" of birds of prey (Section 3503.5) and migratory nongame birds (Section 3513). Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) may violate these sections, and federal law protecting migratory birds. Section 3513 provides for consistency with rules and regulations implementing the MBTA.

**California Fish and Game Code, Section 3511** - Section 3511 of the California Fish and Game Code classifies some bird species – including the California least tern – as "fully protected," and "take" of these species is generally

---

<sup>12</sup> State of California, California Fish and Game Code, Section 2050 et. seq., *California Endangered Species Act*.

<sup>13</sup> State of California, California Fish and Game Code, Sections 1900-1913, *California Native Plant Protection Act*.

<sup>14</sup> State of California, California Fish and Game Code, Section 1908, *California Native Plant Protection Act*.

<sup>15</sup> State of California, California Fish and Game Code, Section 1913, *California Native Plant Protection Act*.

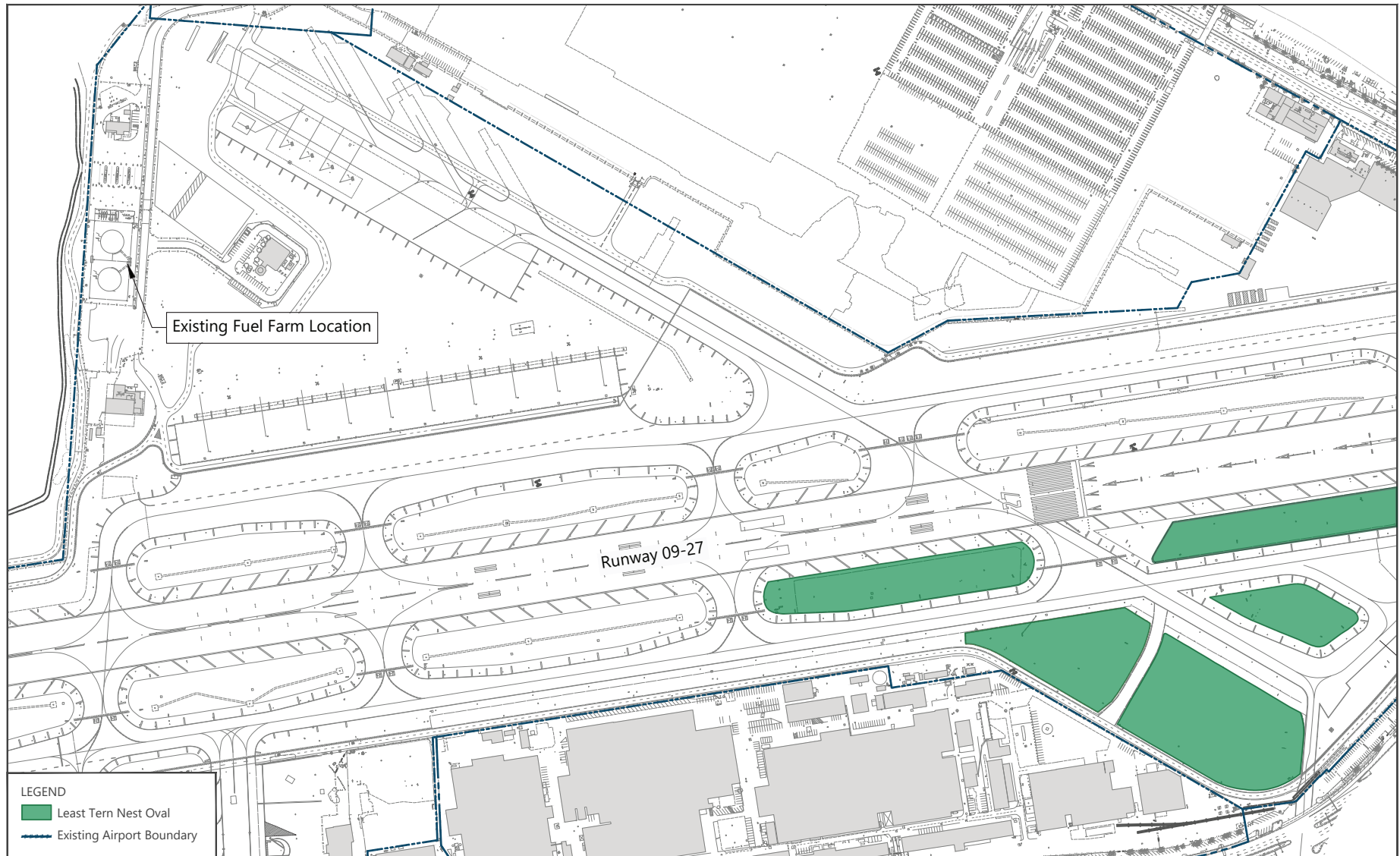


prohibited. CDFW, which implements and enforces the California Fish and Game Code, is not authorized to issue take permits for fully protected species.

#### 4.3.2.2 BIOLOGICAL RESOURCES

The environment surrounding and including SDIA supports a limited number of biological resources due to extensive existing development. The entire Airport is developed or disturbed in some manner and has little, if any, native vegetation existing on the site. Land cover of the unpaved AOA ovals (see **Exhibit 4-6**) between taxiways, the runway, and service roads consists primarily of bare soil, gravel, and non-contiguous patches of low, sparse vegetation.





SOURCE: San Diego International Airport, Airport Layout Plan, Updated October 2009 (basefile); Ricondo, March 2019 (nest locations).



#### EXHIBIT 4-6 CALIFORNIA LEAST TERN NESTING LOCATIONS

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project\_20190319.dwg Layout: 4-1 Plotted: Apr 18, 2019, 12:43PM

The patches of vegetation consist mainly of ruderal species such as Bermuda grass (*Cynodon dactylon*), feathergrass (*Nassella tenuissima*), common tanglehead (*Heteropogon contortus*), and curly dock (*Rumex crispus*).<sup>16</sup> Additionally, instances of Nuttall's acmispon (*Acmispon prostratus*) have been recorded within the AOA ovals.

Prior coordination with the USFWS and the CDFW resulted in the identification of several listed animal species that are known to occur or have the potential to occur at the Airport. AOA ovals are occupied seasonally by California least tern (*Sterna antillarum browni*), a bird that is federally- and state-listed as endangered and identified as a Fully Protected Species per Section 3511(b)(6) of the California Fish and Game Code. The American peregrine falcon (*Falco peregrinus anatum*), a Fully Protected Species per Section 3511(b)(1) of the California Fish and Game Code, also occasionally uses the SDIA area. The California brown pelican (*Pelecanus occidentalis californicus*), a Fully Protected Species per Section 3511(b)(2) of the California Fish and Game Code, uses areas of the San Diego Bay as foraging habitat.<sup>17</sup> Of the sensitive species known to occur within the Airport environs, the California least tern is the sole species that regularly occupies the Airport for a substantial continuous period and is, therefore, considered a biological resource.

**California Least Tern** - The California least tern, a subspecies of least terns, is a small, migratory bird that breeds between the San Francisco Bay and Baja California, Mexico. In San Diego County, the species presence is common in the summer, residing in the area from early April to the end of September. Thirteen California least tern wintering areas are located along the Pacific coast of South America. The species nests colonially on undisturbed, sparsely vegetated, flat areas with loose, sandy substrate adjacent to open water foraging areas. The California least tern is federally listed as endangered with loss of nesting habitat being the primary cause for the initial decline of the population. Few undisturbed beach nesting areas remain, and California least terns are now found in varied habitats ranging from mudflats to airports. Breeding California least terns begin nesting in early-May and continue through July. California least terns abandon the nesting colonies by mid-August and migrate south by mid-September. California least terns exhibit tenacity to the colony site where they first breed successfully. Prey includes northern anchovy, top smelt, killifish, mosquito fish, shiner, surf perch, and mudflat gobies.

California least terns have nested at multiple locations within SDIA. The first observation of tern nesting at SDIA was recorded in 1969.<sup>18</sup> The Airport was monitored for tern nesting activity in 1970 and was found to support the third largest colony in the state of California. CDFW began annual nesting activity surveys in 1976 and continues to conduct the surveys. In the 16 years between 2003 and 2018, the number of nests within the ovals at SDIA sites has fluctuated between a maximum of 157 in 2005 and 18 in 2015.<sup>19</sup> Between 2014 and 2015, there was an 82 percent reduction in nest numbers. According to a report issued by the CDFW, this reduction is likely related to disturbances from construction activity, predators, and nest predation during the early formative period of colony establishment. Other potential causative factors include limited prey fish availability due to above average water temperatures, and

---

<sup>16</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

<sup>17</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

<sup>18</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

<sup>19</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

the long-term overall decline of the tern population in Southern California.<sup>20</sup> The number of breeding pairs and nests more than doubled from 2015 to 2016, although they remained significantly lower than those of 2014 and earlier. Additionally, the SDIA colony has consistently produced a higher annual fledgling success rate (based on the ratio of fledglings per breeding pair) than the statewide average and has continued to exceed the statewide average during the past 4 years, when nest numbers at SDIA dropped.<sup>21</sup>

Least terns have nested at several locations around the Airport, with the south-easternmost oval being the area used most consistently due to its proximity to San Diego Bay, which is a primary food source for the least tern. Airport projects which may result in impacts to the California least tern require avoidance, minimization, and mitigation measures to protect California least terns during construction and operation.

The 1993 Biological Opinion (BO) prepared by the USFWS defines many of the mandatory protective measures and best management practices currently employed at SDIA. The BO identifies areas on the AOA, the aforementioned ovals (see Exhibit 4-6), which the SDCRAA (through the Port District at the time) must enhance and maintain permanently for nesting habitat; establishes funding mandates for annual predator control programs; conduct periodic monitoring; and obligated the FAA and SDCRAA to purchase mitigation at the Chula Vista Wildlife Reserve for California least tern nesting.<sup>22</sup>

In addition, the 1993 BO specified certain practices for construction crews working on facility improvements, including educating workers on prohibitions to applying materials, storing equipment, or performing maintenance near the ovals, constraining ingress and egress routes to specific locations during the nesting season (greater than 1,200 feet from the ovals), lowering crane booms when not in use, ensuring that trash would be properly disposed, and that workers would not feed potential tern predators in the area.

**Nuttall's Acmispon** - The Nuttall's acmispon is a prostrate, annual plant blooming from March to June that is generally restricted to sandy coastal dunes from northern San Diego County to Baja California, Mexico. The species is threatened by human activity and invasive species and found to be rare by the California Native Plant Society, but is not listed under the state or federal Endangered Species Acts.<sup>23</sup> Instances of the plant have been surveyed within the California least tern nesting ovals at SDIA; however, SDCRAA staff has not observed the presence of Nuttall's acmispon within the ovals during monitoring/habitat maintenance activities over the last 20 years, nor is the SDCRAA aware of any documentation of the presence of Nuttall's acmispon within the ovals at SDIA. In addition, a survey for the potential presence of Nuttall's acmispon within the California least tern ovals was conducted on March 31, 2018 by Kevin Clark, Director of BioServices, and Jon Rebman, Curator of Botany at the San Diego Natural History Museum. No Nuttall's acmispon, nor any other rare or sensitive plant species, were found during the survey.<sup>24</sup>

---

<sup>20</sup> State of California, Department of Fish and Wildlife, *California Least Tern Breeding Survey – 2015 Season*, Prepared by Nancy Frost, March 30, 2016. Available: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=122436>.

<sup>21</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan. Section 3.5 – Biological Resources*, September 2019.

<sup>22</sup> U.S. Department of the Interior, Fish and Wildlife Service, Ecological Services, Carlsbad Field Office, *Biological Opinion on the Immediate Action Program, Lindbergh Field Facilities Improvements, San Diego International Airport, San Diego, California*, July 16, 1993.

<sup>23</sup> San Diego Natural History Museum, *RE: Survey for Nuttall's Acmispon at the California Least Tern nesting ovals at San Diego International Airport (SDIA)*, April 6, 2018.

<sup>24</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

### 4.3.3 THRESHOLDS OF SIGNIFICANCE

As described in the Initial Study, under State CEQA Guidelines Appendix G, a project has the potential to result in significant impacts on biological resources if the project would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS; or
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS; or
- c. Have a substantial adverse effect on state or federally protected wetlands including, but not limited to, marsh, vernal pool, coastal, etc. through direct removal, filling, hydrological interruption, or other means; or
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Threshold items "b" and "d" are relevant to the proposed Project and impacts associated with the criteria will be discussed further in this section. Threshold items "a," "c," "e," and "f" were found to have no impact or a less than significant impact (see the Initial Study in Appendix A); as such they are not discussed further.

Per Chapter 3 of the CCA, a project potentially would result in significant impacts on biological resources if the project would:

- a. Conflict with the biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and protect human health shall through minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.
- b. Result in the spillage of crude oil, gas, petroleum products, or hazardous substances due to any development or transportation of such materials; or, not provide effective containment and cleanup facilities and procedures for accidental spills that do occur.
- c. Conflict with a certified long-range plan applicable to the project area.

### 4.3.4 IMPACT ANALYSIS

The proposed Project would construct 3 additional aboveground fuel storage tanks immediately adjacent to the existing fuel storage tanks at the SDIA fuel farm. The fuel farm and proposed work area are in a completely developed portion of the Airport adjacent to Airport operational buildings, pavement, and MCRD training space. No Waters of the U.S., wetlands, or sensitive natural habitat are on or in proximity to the proposed Project site.

The California least tern, a state and federal protected species, and nesting habitat for the tern, are located within Airport property; however, the nearest protected least tern area to the fuel farm is approximately 2,500 linear feet to the southeast and across the active runway, which operates 500-600 daily departures and arrivals. Construction traffic would be directed to the north side of the Airport via West Washington Street, north of the Airport, and would not impact the California least tern or its associated nesting areas. Further, institution of existing requirements identified in the 1993 BO would ensure that construction and operation of the proposed Project would not result in significant impacts to the California least tern or its habitat. Measures specified in the 1993 BO that SDIA undertakes to minimize potential impacts to the California least tern include:

- a. SDIA will maintain ovals on the AOA used by California least tern during nesting.
- b. SDIA will place protective fencing (4 to 6 inches in height) around ovals during nesting season to prevent California least terns from crossing over into the runways and taxiways.
- c. SDIA will fund two predator control positions during nesting season, annually.
- d. SDIA will continue mitigation obligations stipulated by the 1994 Environmental Impact Statement for the Immediate Action Program for Lindbergh Field Facilities Improvements, San Diego, California.
- e. SDIA will minimize structural features in the vicinity of areas frequented by California least tern that allow for perching of predators.

The California least tern diet consists of small fish harvested from shallow surface waters. The closest potential food source for the tern is the San Diego Bay, approximately 1,800 feet south of the nesting ovals. Effectively all movement of nesting California least terns occurs south of the SDIA runway, between the nesting ovals and the San Diego Bay. The proposed Project would not be in proximity to California least tern nesting ovals or obstruct access to California least tern food sources.

The proposed Additional Fuel Tanks would be integrated into the existing fuel farm, including the fuel farm's stormwater and industrial wastewater drainage systems. Operation of the fuel farm necessarily adheres to the SDIA Stormwater Pollution Prevention Plan, referred to as the SWMP, compliance with which would minimize the potential for construction- and operational-related stormwater runoff that could affect nearby surface waters. Therefore, the proposed Project would not conflict with the productivity or quality of local waters.

The proposed Project would include the construction of fuel storage tanks built to the standards required by the Certified Unified Program Agency (County of San Diego Department of Environmental Health, Hazardous Materials Division). Additionally, containment dike walls, consistent with National Fire Protection Code standards, would be constructed at the perimeter of the proposed Additional Tanks to contain aviation fuel in the event of catastrophic tank failure.

Adherence to the SWMP, California Building Code Standards, as well as federal and NFPA containment and fuel storage tanks regulations would provide the appropriate design elements required to protect the fuel farm, and surrounding uses, against sea level rise.

#### 4.3.5 SIGNIFICANCE OF IMPACTS

The area in which the proposed Project is located is devoid of surface waters, wetlands, populations of protected species, or protected habitat. Construction of the proposed Project would not interfere with the California least tern or the species' nesting areas, which are approximately 2,500 feet to the southeast and separated from the fuel farm



by the runway. Additionally, the proposed Project would not interfere with California least tern movement between nesting areas and food sources. The proposed Additional Fuel Tanks would be integrated with the existing fuel farm and operation of the fuel farm would be consistent with existing conditions. Construction standards required for certification of the proposed fuel tanks would reduce the potential for aviation fuel spills and ensure protective and emergency response measures are in place that would reduce the proposed Project's potential to result in impacts to biological resources to a less than significant level. Therefore, impacts due to construction and operation of the proposed Project would be less than significant.

#### 4.3.6 MITIGATION MEASURES

No additional mitigation measures beyond those being implemented in accordance with the 1993 BO are needed for construction or implementation of the proposed Project. Construction and operation of the proposed Project would result in a less than significant impact to biological resources; therefore, no mitigation measures are required.

#### 4.4 HAZARDS AND HAZARDOUS MATERIALS

This section analyzes construction and operational impacts of the proposed Project's effects related to hazards and hazardous materials impacts.

Comments in response to the NOP specific to potential impacts related to hazards and hazardous materials were received from the following:

- County of San Diego Department of Environmental Health– Notification of permits and document updates will be required following construction of the proposed Project. The County verified SDCRAA's obligation for remediation and reporting if contamination is discovered during construction.
- San Diego Unified Port District – The Port District requested verification of and details on the Project scope and emergency systems and response strategy. The Port District noted the fuel farm is in the vicinity of an old firefighting test pit which may have resulted in soil contamination.
- City of San Diego – The City requested clarification on Project design.
- Private Citizens – Requested human health and safety be considered when siting and constructing the proposed Project. Requested that SDCRAA consider suggestions regarding containment dike area capacity. Requested that the SDCRAA consider the local seismic stability risks and design the Project accordingly.

##### 4.4.1 METHODOLOGY

The following hazards and hazardous materials evaluation is based on previous evaluations and reports reflected in the 2008 EIR for the SDIA Airport Master Plan,<sup>25</sup> which provides Airport-wide information on hazards and hazardous materials. Additionally, the California State Water Resources Control Board (SWRCB) GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database were used to identify verify locations of previous and existing hazardous materials contamination and remediation. The site-specific information focuses on the area where the proposed Additional Fuel Tanks would be implemented. The proposed Project's impacts relative to hazards and hazardous materials were analyzed following a three-step process: (1) address the potential

---

<sup>25</sup> San Diego County Regional Airport Authority, *San Diego International Airport Master Plan Final Environmental Impact Report, Section 5.15 - Hazards and Hazardous Materials*, April 2008.

for encountering existing environmental contamination or hazardous materials in the Project site; (2) identify the types and quantities of hazardous materials generated during the operation and construction of the Project; and (3) evaluate these findings with respect to appropriate significance criteria.

This section includes an overview of the regulatory context by which these substances are managed; describes what is known about hazardous materials at the fuel farm and in surrounding areas; and evaluates whether the proposed Additional Fuel Tanks represent potentially significant environmental impacts in connection with these materials. This analysis assumes that SDCRAA will construct and operate all improvements to comply with federal, state and local requirements. For the purposes of this assessment, hazardous materials are meant to include the regulatory defined terms of hazardous materials, hazardous wastes, hazardous substances, and dangerous goods; environmental contamination to soil, surface waters, and groundwater; and regulated substances such as fuel and other petroleum-based products. Other hazards evaluated include those related to the safety of nearby residents and workers, and emergency response plans.

## 4.4.2 EXISTING CONDITIONS

### 4.4.2.1 REGULATORY FRAMEWORK

The two statutes most applicable to airport projects which govern the handling and disposal of hazardous materials, chemicals, substances, and waste, are the Resource Conservation and Recovery Act (RCRA, as amended by the Federal Facilities Compliance Act of 1992) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended (also known as Superfund). RCRA and CERCLA are mostly promulgated by the U.S. Environmental Protection Agency (USEPA). However, there are a number of other regulations governing various aspects of hazards and hazardous materials applicable to the proposed Project.

#### *Federal*

**Comprehensive Environmental Response, Compensation, and Liability Act** - CERCLA authorizes USEPA to respond to releases, or threatened releases, of hazardous substances that may endanger public health, welfare, or the environment. CERCLA also enables USEPA to force parties responsible for environmental contamination to clean it up or to reimburse the Superfund for response or remediation costs incurred by USEPA. Proper site characterization and site remediation of hazardous materials is also regulated by CERCLA and the statute establishes prohibitions and requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous substances at these sites, and established a trust fund for remediation when no responsible party could be identified. The Superfund Amendments and Reauthorization Act of 1986 revises various sections of CERCLA, extends the taxing authority for the Superfund and creates a free-standing law, Superfund Amendments and Reauthorization Act (SARA) Title III, also known as the Emergency Planning and Community Right-to-Know Act (see description below).

CERCLA authorizes short-term and long-term response actions. Short-term actions are those that may be taken to address release or threatened releases requiring prompt response. Long-term actions are remedial actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. Long-term actions are only undertaken at sites listed on the USEPA's National Priorities List.

**Emergency Planning and Community Right-to-Know Act** - Also known as Title III of the SARA, the Emergency Planning and Community Right-to-Know Act (EPCRA) was enacted by Congress as the national legislation on

community safety. SARA stresses the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; requires Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations; provides new enforcement authorities and settlement tools; increases state involvement in every phase of the Superfund program; increases the focus on human health problems posed by hazardous waste sites; encourages greater citizen participation in making decisions on how sites should be cleaned up; and increases the size of the trust fund to \$8.5 billion. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. To implement this act, Congress requires each state to appoint a State Emergency Response Commission (SERC). These commissions are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district. The act provides requirements for emergency release notification, chemical inventory reporting, and toxic release inventories for facilities that handle chemicals.

**Executive Order 12088, Federal Compliance with Pollution Control** - Executive Order 12088, Federal Compliance with Pollution Control, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved. As implementation of the proposed Project would require various federal approvals, Executive Order 12088 is relevant to ensure compliance with applicable federal pollution control standards.

**Hazardous Materials Transportation Act** - Hazardous materials that could be excavated from construction or activities in the project site may require off-site transportation for disposal and/or treatment. Transportation and disposal of hazardous waste would be subject to the Hazardous Materials Transportation Act of 1975 (Title 49 CFR 171 Subchapter C and Title 13 CCR). It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. Carriers are required to report accidental releases of hazardous materials to the U.S. Department of Transportation at the earliest practical moment. Other incidents that must be reported include deaths, injuries requiring hospitalization, and property damage exceeding \$50,000.

The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) are the state agencies with primary responsibility for enforcing federal and state regulations related to transportation within California. These agencies respond to hazardous materials transportation emergencies. Together, these agencies determine container types to be used and grant licenses to hazardous waste haulers for hazardous waste transportation on public roads.

**Occupational Safety and Health Act** - Occupational safety standards have been established in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The goal of the federal Occupational Safety and Health Act of 1970, administered by the Occupational Safety and Health Administration (OSHA), is to ensure that employers provide workers with an environment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. Federal OSHA's requirements for General Industry are contained within the Code of Federal Regulations (CFR) at 29 CFR 1910, and Federal OSHA's requirements for the Construction Industry are contained within 29 CFR 1926. The Occupational Safety and Health Act of 1970 (Title 8 CCR) is implemented by the California Division of Occupational Safety and Health (CalOSHA), which has primary responsibility for developing and enforcing standards for safe workplaces and work practices in California as described below.



**Resource Conservation and Recovery Act** - RCRA governs the generation, treatment, storage, and disposal of hazardous wastes. The goal of the RCRA of 1976 (42 U.S.C. Sections 6901–6987; Title 40 of the CFR) is the protection of human health and the environment, the reduction of waste, the conservation of energy and natural resources, and the elimination of the generation of hazardous waste as expeditiously as possible. The Hazardous and Solid Waste Amendments of 1984 significantly expands the scope of RCRA by adding corrective action requirements, land disposal restrictions, and technical requirements. The corresponding regulations in 40 CFR Parts 260–299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste. Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed of at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as the state's regulation is at least as stringent as RCRA. DTSC received authorization from USEPA to implement RCRA in 1992, and thus DTSC is the primary authority enforcing RCRA hazardous waste requirements in California.

**Toxic Substances Control Act** - In 1976, the federal Toxic Substances Control Act (15 U.S.C. Sections 2601–2671) established a system of evaluation in order to identify chemicals which may pose hazards. The Toxic Substances Control Act also establishes a process by which public exposure to hazards may be reduced through manufacturing, distribution, use, and disposal restrictions or labeling of products. Under the Toxic Substances Control Act (40 CFR 763), the USEPA has enacted strict requirements on the use, handling, and disposal of asbestos containing materials (ACM). These regulations include the phasing out of friable asbestos and ACM in new construction materials beginning in 1979 (40 CFR 763). Friable asbestos may be found in pre-1979 construction. In addition, due to potential adverse health effects in exposed persons, in 1989 the USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the current banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. The Toxic Substances Control Act is enforced by the USEPA through inspections of places in which ACM are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, as well as injunctions against violators.

### **State**

**California Occupational Safety and Health Act** - The California Occupational Safety and Health Act of 1973 (Title 8 CCR) is implemented by CalOSHA, which has primary responsibility for developing and enforcing standards for safe workplaces and work practices in California. For example, under Title 8 CCR 5194 (Hazard Communication Standard), construction workers must be informed about hazardous substances that may be encountered. Compliance with Injury and Illness Prevention Program requirements (Title 8 CCR 3203) would ensure that workers are properly trained to recognize workplace hazards and to take appropriate steps to reduce potential risks due to such hazards. This would be relevant if previously unidentified contamination or buried hazards are encountered. If additional investigation or remediation is determined to be necessary, compliance with CalOSHA standards for hazardous waste operations (Title 8 CCR 5192) would be required for those individuals involved in the investigation or cleanup work. A Site Health and Safety Plan must be prepared prior to commencing any work at a contaminated site or involving disturbance of building materials containing hazardous substances, to protect workers from exposure to potential hazards.

**California Government Code Section 65962.5(a), Cortese List** - The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with CEQA

requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires that the California Environmental Protection Agency (CalEPA) develop, at least annually, an updated Cortese List. The DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

**California Health & Safety Code, Hazardous Materials Release Response Plans and Inventory Law** - Two programs found in the California Health & Safety Code (H&SC) Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Program (HMBP) and the California Accidental Release Program (CalARP). The County of San Diego Department of Environmental Health (DEH) Hazardous Materials Division (HMD) is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP Program provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, a HMBP or Risk Management Plan (RMP) is required pursuant to the regulation. Congress requires USEPA Region 9 (which includes California as well as Nevada, Arizona, and Hawaii) to make RMP information available to the public through USEPA's Envirofacts Warehouse website.

Businesses in California that handle hazardous materials are required to comply with the Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act, also known as the Waters Bill) (Assembly Bill 2185; California H&SC, Chapter 6.6). Basic requirements of hazardous materials planning include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, and the identification of emergency contacts and response procedures. The reporting thresholds for hazardous materials are 55 gallons of a liquid; 500 pounds of a solid; and 200 cubic feet of a compressed gas measured at standard temperature and pressure. The law aims to ensure that the hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or reduce injury to health and the environment. This law is also designed to reduce the occurrence and severity of hazardous materials releases.

**California Fire Code** - The California Fire Code (Title 24, CCR Part 9) regulates the types, configuration, and quantities of hazardous materials that can be stored within structures. The California Fire Code also regulates the storage of hazardous materials (e.g., storage tanks) in outdoor areas. These regulations are implemented through regular inspections of on-site operations and through issuance of notices of violation in cases where storage facilities do not meet code requirements.

**Safe Drinking Water and Toxic Enforcement Act** - The Safe Drinking Water and Toxic Enforcement Act (Proposition 65) is a right-to-know statute that requires businesses to notify Californians about exposures to listed chemicals. Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water. The Proposition was intended by its authors to protect the state's drinking water sources from chemicals known to cause cancer, birth defects or other reproductive harm, and to inform citizens about exposures to such chemicals. The Office of Environmental Health Hazard Assessment administers the Proposition 65 program. The list contains a wide range of naturally occurring and synthetic chemicals that cause cancer or birth defects or other reproductive harm. These chemicals include additives or ingredients in pesticides, common household products, food, drugs, dyes, or solvents. Listed chemicals may also be used in manufacturing and construction, or they may be byproducts of chemical processes, such as motor vehicle exhaust.

**Water Code Section 13267 Order for the Determination of the Presence of Per- and Polyfluoroalkyl Substances** - Water Code Section 13267(b), provides that “a regional board may require any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region... or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of water within its region shall furnish, under penalty of perjury, technical or monitoring reports which the regional board requires.” On March 20, 2019, the SWRCB issued Water Code Section 13267 Order for the Determination of the Presence of Per- and Polyfluoroalkyl Substances (Order WQ 2019-0005-DWQ) (referred to herein as the PFAS Order) requiring airports and landfills that have “accepted, stored, or used materials that may contain per- and polyfluoroalkyl substances (PFAS)” to submit a work plan for a one-time preliminary site investigation of PFAS impacts at the facility. The report is required to be submitted to the facility’s Regional Water Quality Control Board no later than 60 days following the date the order was issued. The PFAS Order identifies specific airports, including SDIA, that are certified to use aqueous film forming foam (AFFF) for firefighting applications. PFAS are present in AFFF and use of AFFF in emergency and training operations can be a source of PFAS in soil and/or groundwater. The SWRCB and the Regional Water Quality Control Boards will evaluate the data collected under the PFAS Order to make decisions in implementing appropriate regulatory action, in anticipation of emerging regulatory standards for PFAS.

### **Local**

**San Diego County Air Pollution Control District** - The mission of the San Diego County Air Pollution Control District (APCD) is to protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, foster community involvement, and develop and implement cost-effective programs meeting state and federal mandates, considering environmental and economic impacts. Among the emissions sources the APCD is responsible for regulating, the agency is responsible for enforcing rules and regulations for construction equipment, per APCD Regulation II Rule 12.1. Other APCD rules (such as Rules 50, 51, and 59) require permits, monitoring plans, and other dust mitigation measures for large scale construction projects and waste sites.

**San Diego County Multi-Jurisdictional Hazard Mitigation Plan** - The San Diego County Multi-Jurisdictional Hazard Mitigation Plan (HAZMIT) identifies hazardous material risks within San Diego County and specifies methods and strategies for risk minimization. The purpose of the HAZMIT is to enhance public awareness of hazards in the community; promote compliance with state and federal program requirements; enhance local policies for hazard mitigation and coordination of mitigation-related programming; and, achieve regulatory compliance that would allow San Diego County to receive federal pre-and post-disaster funding.

**San Diego County Operational Area Emergency Operations Plan** - The San Diego County Operational Area Emergency Operations Plan (OA EOP) details a comprehensive emergency management system which provides for a planned response to natural disasters and other human-related emergencies, including hazardous materials incidents, based on the state-mandated Standardized Emergency Management System (SEMS) and the federally mandated National Incident Management System (NIMS). The OA EOP delineates operational concepts relating emergency situations, identifies components of the Emergency Management Organization, and defines emergency response responsibilities for every municipality in San Diego County as well as unincorporated areas.

**San Diego International Airport Stormwater Management Plan** - Under the San Diego Region Municipal Stormwater Permit (NPDES Permit CAS0109266), the Authority was required, as the owner and operator of a municipal separate stormwater sewer system, to develop the San Diego International Airport Stormwater Management Plan (SWMP). The SWMP also serves as the Stormwater Pollution Prevention Plan (SWPPP) required

by NPDES Permits No. CAS000001 (a statewide General Permit to Discharge Storm Water Associated with Industrial Activity), which regulates potential stormwater pollution from industrial activities at the Airport including aircraft and equipment maintenance, cleaning, and de-icing.<sup>26</sup> The SWMP includes provisions for compliance with the NPDES requirements per the Clean Water Act.

#### 4.4.2.2 HAZARDS AND HAZARDOUS MATERIALS

**Emergency Response and Evacuation Access** - The fuel farm is adjacent to West Washington Street, which provides direct access to Pacific Highway and Frontage Road, north of the proposed Project site. The San Diego Fire Department (SDFD) provides fire protection services to the City of San Diego, including SDIA. Additionally, SDFD is part of the San Diego County Mutual Aid Agreement for fire departments, in which separate fire departments within San Diego County provide assistance across jurisdictional boundaries when additional resources are needed. The ARFF, which is less than 200 feet from the proposed Project site, is staffed and operated by the SDFD and would continue to provide paramedic and fire protection services on the airfield and at the Airport.

**Fire Hazards** - The nature of the fuel farm requires the storage and transference of aviation fuel, which is defined as a combustible substance in the California Fire Code. The existing fire suppression system comprises six foam monitors and a foam building (both using AFFF) and a fire alarm system, meets California Fire Code requirements, and is maintained in accordance with Title 24, CCR 9 specifications.

**Hazardous Materials Used or Created Onsite and Known or Potential Contamination Areas** - The existing fuel farm provides bulk aviation fuel storage for SDIA tenant airlines, as well as other potentially hazardous substances associated with operation of a standard bulk fuel storage facility. Aviation fuel, as well as fire retardants, cleaners, and solvents that may be used in the operation of a bulk storage facility, are hazardous substances which are necessarily located on the proposed Project site. Due to the nature of bulk fuel storage facilities, contaminated soils may underlie the proposed Project site.

The California State Water Resources Control Board's GeoTracker tool identifies sites in California that have the potential to impact water resources. The GeoTracker tool identifies the closest soil contamination remediation site to the proposed Project site as the former fire-fighting test pit, approximately 350 feet northeast of the existing fuel tanks, which was also noted by the Port District in a response to the NOP. The GeoTracker tool states cleanup status of the former fire-fighting test pit site is "completed and the case closed."<sup>27</sup>

The California DTSC's EnviroStor tool is the California DTSC's data management system for tracking cleanup, permitting, enforcement, and investigation, efforts at sites with known contamination or those where there may be reason for further investigation. The EnviroStor tool lists six sites on Airport property having completed or currently undergoing remediation. The closest permitted site to the fuel farm, which the DTSC lists as TDY Industries, LLC, is more than 2,800 linear feet south near North Harbor Drive.<sup>28</sup> Four former military cleanup sites are listed, including one at the Rental Car Center; two on the AOA, at the intersection of Taxiways C and F; and a fourth in the parking

---

<sup>26</sup> San Diego County Regional Airport Authority, *SAN Stormwater Management Plan*, June 2015, amended January 2019. Available: [https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12857&Command=Core\\_Download&language=en-US&PortalId=0&TabId=183](https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12857&Command=Core_Download&language=en-US&PortalId=0&TabId=183).

<sup>27</sup> California State Water Resources Control Board, *GeoTracker* Website: <http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=San+Diego> (accessed April 2019).

<sup>28</sup> California Department of Toxic Substances Control, *EnviroStor* Website: <https://www.envirostor.dtsc.ca.gov/public/> (accessed February 2019).

lot of the Delta Air Lines cargo facility. The former military cleanup sites are more than 2,000 feet away from the proposed Project site. An 'evaluation' site is identified at the intersection of Pacific Highway and Sassafras Street, approximately 3,400 feet east of the proposed Project site. None of the listed sites are in proximity to the fuel farm that would pose a risk of contamination at the site due to past activity.

**PFAS in Foam Used for Fire Suppression** - As described in Section 4.4.2.1, SDIA is certified to use AFFF for fire suppression purposes. PFAS present in AFFF could potentially impact soils and/or groundwater. While SDIA does not currently have a requirement to monitor and test for PFAS, PFAS have been detected in groundwater as part of site assessments conducted in the vicinity of a former firefighting training area that has not been used for several decades.<sup>29</sup>

SDIA is required by the FAA to conduct tests of AFFF equipment annually. Since the early 2000s, AFFF used in all firefighting training activities at SDIA has been captured and disposed of in the sanitary sewer, which has greatly reduced the potential for PFAS to impact soils and/or groundwater. Further, SDIA has newly acquired a "NoFoam System" that allows for annual AFFF testing without using foam, as allowed by a recent FAA CertAlert.<sup>30</sup> While future testing of foam equipment can be conducted without using foam, FAA regulations continue to require the use of foam containing PFAS for emergency firefighting operations. SDIA is in the process of exchanging the existing foam stored on-site to the most environmentally-friendly foam available (Chemguard 3% AFFF C-30-6-1MS-C).<sup>31</sup>

**Seismic Safety** - A review of the 2019 ADP Recirculated Draft EIR indicated that the proposed Project site is not located within an Alquist-Priolo Special Study Zone; however, an active Alquist-Priolo earthquake fault zone, the Spanish Bight Fault Zone, extends from San Diego Bay to a terminus approximately 2,700 feet south of the proposed Project site.<sup>32</sup> The nearby active Spanish Bight fault is a segment of the Rose Canyon fault zone. The Kleinfelder Fault Hazard Study (Hazard Study) was prepared in 2017 to analyze subsurface conditions and seismic risk for SDIA ADP projects.<sup>33</sup> The Hazard Study resulted in the identification of a "No Build Zone" that includes zones of active faulting and additional buffers to reduce proximity to and risk of construction in areas of geologic instability. The No-Build Zone study area identified in the 2019 ADP Recirculated Draft EIR is approximately 1,600 feet south of the proposed Project site.<sup>34</sup>

---

<sup>29</sup> Gilb, Richard, Manager – Environmental Affairs, SDCRAA, Personal Communication, April 29, 2019.

<sup>30</sup> U.S. Department of Transportation, Federal Aviation Administration, *National Part 139 CertAlert No. 190-01, Aqueous Film Forming Foam (AFFF) Testing at Certificated Part 139 Airports*, January 17, 2019.

<sup>31</sup> Gilb, Richard, Manager – Environmental Affairs, SDCRAA, Personal Communication, April 29, 2019.

<sup>32</sup> Wilson Geosciences Inc., *Seismic and Geologic Technical Background Report for the City of San Diego Midway-Pacific Highway and Old Town Community Plan Updates, and Environmental Impact Report*, City of San Diego, San Diego County, California, April 2012.

<sup>33</sup> Kleinfelder, *Fault Hazard Study CIP 400002B ADP-Programmatic Documents-ADC San Diego International Airport San Diego, California, Kleinfelder Project No. 20174291.001A*, Prepared for San Diego County Regional Airport Authority, May 22, 2017.

<sup>34</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.8 – Geology and Soils*, September 2019.

**Sensitive Uses in Proximity to the Site** - The closest sensitive receptors to the Project site are the MCRD child development facility, on Tripoli Avenue; MCRD barracks, on Midway Avenue; and a multi-family residential building, on Hancock Street located approximately 2,600 feet, 1,100 feet, and 2,200 feet, respectively, northwest/north of the proposed Project site.

#### 4.4.3 THRESHOLDS OF SIGNIFICANCE

As described in the Initial Study, under State CEQA Guidelines Appendix G, a project has the potential to result in significant impacts on hazards and hazardous materials if the project would:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment; or
- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area; or
- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The potential for impacts associated with construction and operation of the proposed Project, thresholds for which are listed in Section IX of State CEQA Guidelines, Appendix G, Hazards and Hazardous Materials, were evaluated during the Initial Study. Threshold items "a," "b," "d," and "e" are relevant to the proposed Project and impacts associated with the criteria will be discussed further in this section. Threshold items "c," "f," and "g" were found to have no impact or a less than significant impact (see the Initial Study in Appendix A); as such they are not discussed further.

#### 4.4.4 IMPACT ANALYSIS

Construction of the proposed Project would result in the transportation and use of hazardous substances in amounts consistent with construction projects of similar size. Release of hazardous materials are subject to regulatory reporting requirements and complex remediation responses identified in local, state, and federal regulations. Construction work would be conducted in accordance with the Airport's SWMP, which serves as a SWPPP and a Jurisdictional Runoff Management Program, to ensure that potentially hazardous substances are handled and disposed of in accordance with the state, local, and federal regulations and BMPs defined in the Airport's SWMP. Additionally, release of hazardous materials during construction activities would be addressed through requirements identified in the Hazardous Material Release Response Plans and Inventory Law and California Hazardous Waste Control Law, in compliance with the EPCRA. Adherence to required hazardous materials transport



and emergency response procedures identified in the SWMP and California Fire Code would limit the exposure of hazardous substances to the environment.

The proposed Project would involve the routine transport and storage of aviation fuel; however, operation of the proposed Project would be a continuation of an existing Airport use. Additional fuel tanks would increase the amount of fuel stored at the Airport but would not change the manner in which the fuel is stored, delivered, or distributed. However, the increase in fuel storage at SDIA under the proposed Project would have the potential to create a significant hazard to the public or the environment. The Airport would necessarily construct the proposed Project, and operate the fuel farm, in accordance with California Building Standards Code (CBSC) and County of San Diego Department of Environmental Health, Hazardous Materials Division regulations.

Operation of Airport facilities, including the fuel farm, are subject to NPDES Permits Nos. CAS000001 (a statewide General Permit to Discharge Storm Water Associated with Industrial Activity) and CAS0109266 (the San Diego Region Municipal Stormwater Permit). Covered activities include, but are not limited to, aircraft maintenance and fueling, cleaning, and deicing operations. The permit requires a Permittee to develop and implement Stormwater Management Plans containing BMPs intended to eliminate or reduce the release of contaminants into the environment. A number of these BMPs, identified in the SWMP, pertaining to hazardous materials include secondary containment and covered storage facilities; procedures and equipment for the clean-up of spills and accidental releases; training, auditing, and other work practices. The proposed fuel tanks would operate in a manner consistent with the existing fuel tanks and be integrated into the existing fuel farm storage and distribution system. Construction and operation of the proposed fuel tanks would be subject to strict oversight and the likelihood of catastrophic failure of tanks or inadequate response to such a catastrophe would be nominal.

Integration of the proposed safety elements with the existing safety systems and processes would reduce the potential for creation of a significant hazard to the public or the environment. Fuel would continue to be delivered to and from the fuel farm via existing supply and distribution pipelines using existing procedures. Leak detection pipelines would be constructed under the proposed fuel tanks to ensure functionality and integrity of the proposed fuel tanks.

The expanded fuel farm fire suppression system would be constructed, operated, and maintained in conformance with Chapter 9, Fire Protection Systems, and Chapter 20, Aviation Facilities, of the 2016 California Fire Code. Additionally, the proposed Project would include the construction of containment dike walls that have the capacity to hold contents of the SDIA fuel stores, per National Fire Protection Association 30 requirements. The existing fire protection system would be expanded to provide coverage for the proposed fuel tanks and containment dike walls. Revisions would also be made to the existing fire suppression system to address operational concerns identified by the SDFD.<sup>35</sup> Undersized or outdated elements of the existing fuel farm foam building would be replaced with more effective components. Each proposed fuel tank would be constructed at a distance of at least 50 feet from the next tank and the nearest property line, per California Fire Code requirements. The existing containment dike wall system would be expanded to create adequate containment areas around each of the proposed fuel tanks, which would provide adequate protection against impacts associated with catastrophic failure of one or more tanks.

---

<sup>35</sup> Burns McDonnell Engineering Company, Inc., *Basis of Design Report – SAN Fuel Committee – SAN Additional Fuel Tanks Project (No. 99965)*, March 2019.

Twenty-one foam makers using AFFF would be installed at the fuel farm as a part of the fire protection system improvements. Nine of the foam makers would be installed around the three proposed fuel tanks within the new containment dikes walls and six additional foam makers would be installed in each containment area surrounding the existing fuel tanks. The proposed foam makers would be integrated into the existing fire suppression control system. The existing fire lanes adjacent to the fuel farm would be extended 400-500 feet to provide emergency response with visual aids in the event of an emergency. The proposed Project would adhere to applicable fire and hazardous materials safety requirements and existing safety systems and emergency response resources would be adapted to serve the proposed Project.

In compliance with the PFAS Order described in Section 4.4.2.1 above, SDIA developed a work plan for a preliminary investigation to determine if soil and/or groundwater is impacted by PFAS associated with AFFF to help the State Water Quality Control Board (SWQCB) and the San Diego Regional Water Quality Control Board (RWQCB) get an understanding of PFAS concentrations at SDIA. The work plan was submitted to the San Diego RWQCB in late May 2019 and approved on July 22, 2019. Results of the investigation must be reported to the RWQCB by December 13, 2019.

The proposed Project site is not on a site listed by any local, state, or federal agency as having hazardous materials contamination. However, due to the nature of airport operations, previously unknown contamination could potentially be discovered during excavation activities. During construction, previously unidentified USTs, hazardous materials, petroleum hydrocarbons, or hazardous or solid wastes may be encountered and may result in the exposure of the construction workers, the public, and/or the environment to hazardous materials. Additionally, construction activities, including demolition, may result in the discovery of previously unknown areas of contaminated soils or generate hazardous or solid wastes and debris and may result in the exposure of the Project personnel, the public, and/or the environment to hazardous materials. The potential for unknown discovery of contaminated soil during construction of the proposed Project would result in a significant impact relative to construction.

The proposed fuel tanks would be constructed at the existing SDIA fuel farm and operation of the additional tanks would be consistent with the existing procedures. The proposed Project would not increase the number of aircraft operations at the Airport or increase the number of passengers served by carriers at SDIA. Additionally, the proposed Project would not require additional staff for operation and public access to the Project site would not be provided. Therefore, the proposed Project would not increase the number of people exposed to risks associated with hazards or hazardous materials.

#### **4.4.5 SIGNIFICANCE OF IMPACTS**

The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor would it result in a safety hazard or excessive noise for people residing or working in the proposed Project site. The proposed Project is not on a site listed by any local, state, or federal agency as having hazardous materials contamination. However, due to the site's proximity to existing hazardous materials and the nature of airport operations, the proposed Project has the potential to result in impacts to the environment associated with accidental discovery of contaminated soils during construction which would be a potentially significant impact.

#### 4.4.6 MITIGATION MEASURES

The SDCRAA will implement the following measures to minimize, to the extent possible, the potential significant impacts of construction of the proposed Project at the existing fuel farm.

**HZ-1. Hazardous Materials Management Plan and Hazardous Materials Release Response Plan** - Prior to site excavation activities and/or construction-related dewatering, a Hazardous Materials Management Plan (HMMP) and Hazardous Materials Release Response Plan shall be prepared to include the following:

- Description of roles and responsibilities, including those of the Contractor (during construction), the Vendor (during operation), and SDCRAA;
- Procedures for identification, initial screening for and notifying the appropriate parties of contaminated soil and/or groundwater encountered during excavation or ground improvement;
- Procedures for securing known or suspected areas of contamination;
- Procedures for removal, transport, treatment and/or disposal of contaminated soil and/or groundwater;
- Procedures for addressing partial and catastrophic fuel tank and fuel supply pipeline failure; and
- Site-specific Health and Safety Plan for safety and protection of construction Contractor, Airport personnel, and the general public from exposure to contaminants.

##### 4.4.6.1 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operation of the proposed Project would comply with all applicable hazardous materials and health and safety regulations. Implementation of BMPs identified in the SWMP and compliance with mitigation measure HZ-1 would ensure any previously unknown contaminated soil discovered during construction is recognized, investigated to the extent practical, and remediated in accordance with applicable regulations. With implementation of mitigation measure HZ-1, impacts associated with construction and operation of the proposed Project would be reduced to a level that is less than significant.

#### 4.5 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Construction of the proposed Project would involve the use of construction equipment with combustible engines and irrecoverable building materials. The size and scope of the Project is limited and use of non-renewable resources during construction would not create a shortage. The proposed Project would expand an existing use at an existing fuel farm; however, the improvements would accommodate the conveyance and use of aviation fuel, a non-renewable resource. The proposed Project would have no bearing on the amount of aviation fuel supplied to aircraft at SDIA; rather, the improvements would reduce or eliminate the need for fuel tanker trucking operations to supplement the Airport's storage. No improvements beyond those proposed for the fuel farm would be required to construct or operate the proposed Project. Further, the addition of fuel storage capacity at SDIA would not increase the capacity of the airfield or result in a change in aircraft operations.

#### 4.6 GROWTH-INDUCING IMPACTS

Due to the relatively limited scale and schedule of the proposed Project, it is not likely the improvements would result in any growth inducing activity. Contractor personnel performing construction work would likely come from

the local population and the number of construction workers required to complete the proposed work would not substantially affect the local labor pool. Operation of the fuel farm following construction of the Additional Fuel Tanks Project would be consistent with the existing fuel farm operation and no additional employees would be required. The proposed improvements would accommodate existing aircraft operation levels. Additional fuel storage capacity at SDIA would not induce growth in the immediate vicinity of the Airport or in the larger region.

## 4.7 CUMULATIVE IMPACTS

This section of the EIR analyzes the cumulative impact of the proposed Project on the environment when considered in combination with past, present, and reasonably foreseeable projects in proximity to the proposed Project. Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”<sup>36</sup> Analysis for cumulative impacts is not as exhaustive as the analysis for individual environmental resource categories, but “guided by the standards of practicality and reasonableness.”

The cumulative impacts analysis is based on projects identified in the 2019 ADP Recirculated Draft EIR and off-Airport projects in the vicinity of the proposed Project site. Table 3-1 provides a list of on- and off-airport past, present, and probable future projects considered in the assessment of cumulative impacts for the three environmental resource categories carried forward for analysis in this section of this EIR.

### 4.7.1 ASSESSMENT OF POTENTIAL CUMULATIVE IMPACTS ON AESTHETICS

Development projects at/adjacent to SDIA involving notable above-ground structural improvements in combination with the proposed Project’s structural improvements could pose the potential for impacts to views/viewsheds through the Airport. Past/present development projects at the Airport completed within the last 3 years with notable above-ground structural improvements include the North Side Improvements (in particular, the Rental Car Center) and the T2 Parking Plaza. Proposed future development projects at the Airport with notable above-ground structural improvements consist of the cargo handling buildings associated with the Future Cargo Facilities in the northern part of the Airport, and components of the proposed ADP, including the Terminal 1 Replacement and new Terminal 1 Parking Structure.

The relevant geographic area of analysis for cumulative aesthetics impacts includes the Airport proper and views towards the south/southwest (i.e., towards San Diego Bay and the Pacific Ocean).

As discussed in Section 4.2, Aesthetics, and shown in Exhibits 4-2 through 4-5, the proposed Additional Fuel Tanks would not block existing views of visual resources and designated viewsheds/view corridors identified in regulatory/planning documents would be preserved. The past/present development projects at SDIA (T2-West [the Green Build], the North Side Improvements, and the T2 Parking Plaza) similarly do not block existing views of visual resources and designated viewsheds/view corridors under both baseline conditions and in conjunction with the proposed facilities. As discussed and illustrated in Section 3.1, Aesthetics and Visual Resources, of the 2019 ADP Recirculated Draft EIR, the proposed ADP facilities would not block existing views of visual resources, including San Diego Bay and the Pacific Ocean, and designated viewsheds/view corridors identified in regulatory/planning documents would be preserved. Based on the above, the proposed Project, in combination with cumulative projects, would result in a less than significant cumulative impact related to maintaining views of visual resources/scenic

---

<sup>36</sup> State CEQA Guidelines, Title 14, California Code of Regulations, Section 15355, “Cumulative Impacts.”

vistas and designated viewsheds/view corridors identified in regulatory/planning documents. Further, the proposed Project, in combination with cumulative projects, would be consistent with existing on-Airport facilities (with buildings heights up to 90 feet<sup>37</sup>), and with the low- and medium-rise buildings surrounding the Airport, and would not be out of character for the area. As such, the proposed Project, in combination with cumulative projects, would result in a less than significant cumulative impact related to neighborhood character.

#### **4.7.2 ASSESSMENT OF POTENTIAL CUMULATIVE IMPACTS ON BIOLOGICAL RESOURCES**

Construction and operation of the proposed Project would be restricted to the area within and immediately surrounding the existing fuel farm. The proposed Project was found not to result in any significant impact to biological resources due to the distance between the proposed Project site and the California least tern nesting areas and food sources. The relevant geographic area of analysis for cumulative biological resources impacts includes the Airport proper. Construction and operation of development projects near the California least tern nesting areas ("ovals") at the southeast portion of SDIA, such as the new on-airport access roadway and associated multi-use pedestrian and bicycle path, new remain overnight (RON) aircraft parking areas, realignment of Taxiway B, and construction of a new Taxiway A, and the expansion of the capture area of the SAN Stormwater Capture and Reuse System included in the proposed ADP improvements, as well as the Terminal Link Roadway (a "past" project included as part of the Northside Improvements), pose the potential for indirect cumulative impacts to California least terns at SDIA. SDCRAA would continue to implement the measures specified in the 1993 BO and in the 2013 and 2018 Informal Section 7 Consultations between the FAA and USFWS regarding potential effects of the SDIA Northside Improvements Project and the Taxiway B Object-Free Area Improvement Project, respectively, which would avoid and/or minimize potential indirect impacts from construction and operation of the proposed Project and cumulative projects at SDIA. In addition, SDCRAA would implement project-specific mitigation measures as part of the proposed ADP to ensure that potential indirect impacts from the ADP to California least tern would be less than significant.<sup>38</sup> As such, construction and operation of the proposed Project, in combination with cumulative projects, would not have a substantial adverse effect on California least tern, and the cumulative impact would be less than significant.

#### **4.7.3 ASSESSMENT OF POTENTIAL CUMULATIVE IMPACTS ON HAZARDS AND HAZARDOUS MATERIALS**

Construction and operation of the proposed Project was found to have the potential to result in significant impacts associated with the accidental discovery of contaminated soil during excavation activities at the proposed Project site; however, with implementation of mitigation measure HZ-1, such impacts associated with construction and operation of the proposed Project would be reduced to a level that is less than significant. The potentially significant impact is specific to the proposed Project site and associated with site-specific construction activities. Additionally, excavation associated with the proposed Project is not located within construction areas associated with the ADP projects. All past, present, and probable future projects that involve the handling of hazardous materials and/or remediation of hazardous wastes would be subject to the same federal, state, and local regulations regarding hazardous materials/waste handling, removal, transport, and storage as the proposed Project. Implementation of

---

<sup>37</sup> The only exception is the existing Airport Traffic Control Tower (152 feet).

<sup>38</sup> San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

these preventative measures would minimize the potential for risks associated with hazardous materials. Therefore, with implementation of Project-specific mitigation measure identified in Section 4.4.6 above, the proposed Project, in combination with cumulative projects, would result in a less than significant impact related to hazards and hazardous materials.

## 5. ALTERNATIVES

### 5.1 INTRODUCTION

The State CEQA Guidelines require that an EIR include a discussion of a reasonable range of project alternatives that would “feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the proposed Project, and evaluate the comparative merits of the alternatives” (State CEQA Guidelines Section 15126.6). Within that context, this Section discusses alternatives to the proposed Project.

Key provisions of the State CEQA Guidelines on alternatives (Section 15126.6(a-f)) are excerpted below to explain the foundation and legal requirements for the alternatives analysis in this EIR.

- “An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible<sup>1</sup> alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.” (15126.6(a))
- “...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.” (15126.6(b))
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6(e)(1)) “The ‘no project’ analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6(e)(2))
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” (15126.6(f))
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries,...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” (15126.6(f)(1))
- For alternative locations, “[o]nly locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6(f)(2)(A))
- “If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible

<sup>1</sup> “Feasible” means capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (State CEQA Guidelines Section 15364).



alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location." (15126.6(f)(2)(B))

- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (15126.6(f)(3))

Consideration and analysis of alternatives benefits decision-makers by providing more complete information about the potential impacts of land use decisions. Consequently, there is a better understanding of the interrelationship among all of the environmental topics under evaluation. Decision-makers must consider approval of an alternative if the alternative is determined to be feasible and substantially lessen or avoid significant environmental impacts identified for a proposed project.

## 5.2 FACTORS CONSIDERED IN THE SELECTION OF ALTERNATIVES

The State CEQA Guidelines recommend that an EIR briefly describe the rationale for selecting the alternatives to be discussed, identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the factors underlying the lead agency's determination. The following factors were used to determine the practicality of alternatives:

- The extent to which the alternative would accomplish the objective of the project, as described in Section 2.2
- The extent to which the alternative would avoid or lessen the identified significant and/or unavoidable environmental impacts of the project

Per Section 15126.6(b) of the State CEQA Guidelines, the alternatives discussion shall focus on alternatives to a project (or its location) that are capable of avoiding or substantially lessening significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be financially costlier.

As discussed in the Initial Study (Appendix A), the proposed Project's impacts to agriculture and forestry resources; air quality; cultural resources; energy; geology and soils; greenhouse gas emissions; hydrology and water quality; land use and planning; mineral resources; noise, population and housing; public services; recreation; transportation; tribal cultural resources; utilities and services; and wildfire would not be significant. The proposed Project's impacts to aesthetics, and biological resources, would be less than significant, while impacts to hazards and hazardous materials would be less than significant with the implementation of mitigation measures. This alternatives analysis, therefore, focuses on project alternatives that could avoid or substantially lessen the hazards and hazardous materials impacts of the proposed Project.

The following alternatives to the proposed Project were identified:

- No Project Alternative
- Mission Valley Terminal Alternative
- Off-Airport Fuel Tank Alternative

As described below in Section 5.4, the Mission Valley Terminal Alternative and the Off-Airport Fuel Tank Alternative were considered but rejected for further consideration as they do not meet stated Project objectives of increasing fuel storage capacity at the Airport or accommodating pipeline shutdowns or fuel farm maintenance.

### 5.3 PROJECT OBJECTIVES

The objective of the proposed Project is to increase fuel storage at the Airport to meet industry fuel reserve standards for existing aircraft operations and to accommodate supply pipeline shutdowns or fuel farm maintenance activities without compromising aircraft refueling service. Additionally, the proposed Project would greatly reduce the need for, and risks associated with, fuel resupply or supplementation via tanker truck.

### 5.4 ALTERNATIVE 1 – NO PROJECT

CEQA requires evaluation of the No Project alternative to enable decision-makers to compare the impacts of the proposed Project with the impacts of continuing to operate under the status quo.<sup>2</sup> The "no-project" alternative analysis must discuss the existing conditions at the time the notice of preparation is published and assess what "would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans."<sup>3</sup>

In lieu of the construction of additional aviation fuel storage tanks at SDIA under the proposed Project, the No Project Alternative would continue to maintain existing aviation fuel storage and delivery operations at the Airport. Environmental impacts associated with the continuation of existing aviation fuel supply operations and storage are compared to the proposed Project.

#### 5.4.1 DESCRIPTION OF ALTERNATIVE 1 – NO PROJECT

The existing aviation fuel farm at SDIA consists of two identical aviation fuel tanks operated by Allied Aviation Service, Inc., a third-party aviation fuel company, that are approximately 80 feet in diameter and 28 feet in height and have a total useable fuel storage capacity of 1.71 million gallons. The existing tanks are supplied via regional refineries through pipeline deliveries from the 10th Avenue Terminal six days a week. The regional aviation fuel supply chain to the Airport and the 10th Avenue Terminal is highlighted below on **Exhibit 5-1**. During the first five days of the week, delivery volumes are roughly equal to the previous day's use. No delivery is received on day 6 and on day 7 the existing SDIA fuel farm receives a delivery to replenish fuel used on both days 6 and 7. The typical flow rate is approximately 7-hours per one-day batch with the inbound fuel being received by one of the two tanks. The other tank would be operational on these days, issuing fuel throughout the Airport. The next day, the receiving and issuing tanks are swapped.<sup>4</sup>

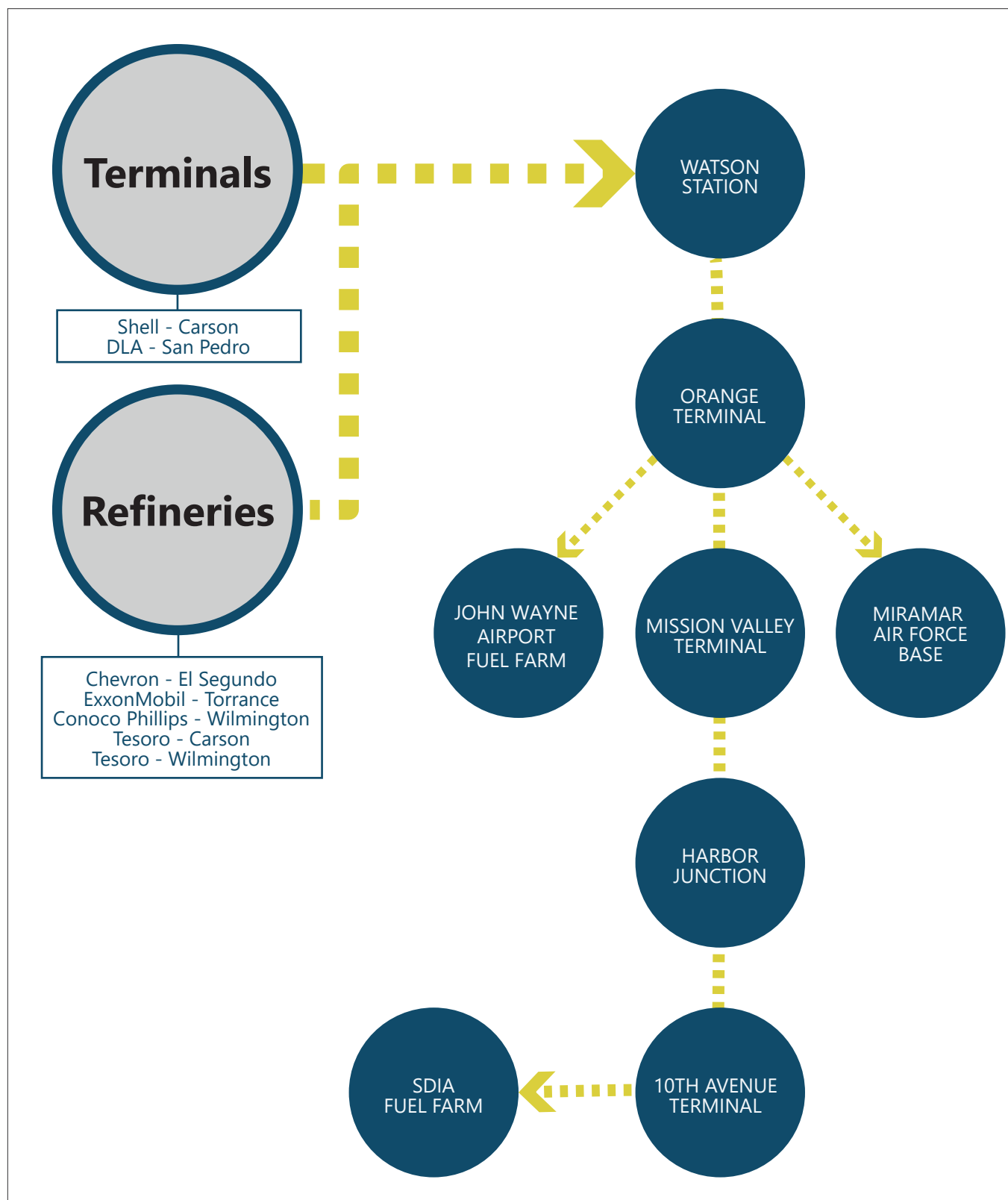
The existing SDIA fuel farm was originally designed to receive fuel by tanker truck, and as such, has 6 tanker truck unloading stations. Although almost all fuel currently supplied to the SDIA fuel farm is transported via pipeline, occasional tanker truck deliveries are conducted, primarily for smaller carriers without adequate capacity to utilize the aviation fuel pipeline. Additionally, any lapse in the on-airport fuel delivery system, as well as inspection and maintenance activities, requires fuel to be delivered via tanker truck, which results in substantially slower and less reliable replenishment of the Airport's supply.

---

<sup>2</sup> California Code of Regulations, Title 14, §15126.6(e)(1).

<sup>3</sup> California Code of Regulations, Title 14, §15126.6(e)(2).

<sup>4</sup> Argus, *Engineering Study for SAN Supply Chain*, July 2017.



SOURCE: Argus Engineering, PLLC, 2019; Ricondo &amp; Associates, Inc., 2019.

**EXHIBIT 5-1****AVIATION FUEL SUPPLY CHAIN**

Further, as the number of aircraft operations and size of aircraft serving the Airport has increased, the daily aviation fuel use has also increased, which consequently results in the expedited depletion of on-airport fuel reserves. In July 2018, the peak aviation activity month during 2018, the fuel farm had the capacity to supply approximately 2 days of fuel.<sup>5</sup> The limited fuel supply during peak periods exposes SDIA to the risk of replenishing fuel supplies via tanker truck if the supply line is compromised, disrupted, or is shut down for maintenance. In the event that a pipeline is disrupted, and the Airport's fuel is to be supplied entirely by tanker trucks, the maximum daily fuel usage for 2017 of 662,800 gallons would require approximately 88 tanker truck deliveries per day assuming the tanker trucks have a capacity of 7,500-gallons.<sup>6</sup>

#### 5.4.2 ANALYSIS OF ALTERNATIVE 1 – NO PROJECT

The current SDIA fuel farm does not meet industry on-airport fuel reserve standards for existing aircraft operations nor does it allow for efficient maintenance of existing storage tanks, supply pipelines, and associated systems. Currently, maintenance activities that require temporary shutdown and evacuation of fuel storage tanks would also necessitate delivery of aviation fuel supplies by tanker truck as well as delivery of fuel to aircraft via tanker truck. Truck delivery of fuel would result in significant increase in traffic on the local surface transportation network, a measurable increase in emissions associated with tanker truck trips, and reduced efficiency of the surface transportation network. On-Airport tanker truck deliveries to aircraft would increase vehicular traffic on the AOA, which can lead to operational inefficiencies during peak periods. Continued use of the existing fuel farm would not meet the Project objectives of providing on-Airport storage capacity commensurate with industry standards, allowing maintenance on the supply pipeline, individual fuel tanks, or the associated ancillary fuel farm systems, or reduce risks associated with tanker truck delivery of fuel.

The No Project Alternative would not change the existing fuel farm development; therefore, the No Project Alternative would have no impact on aesthetics at the proposed Project site. The No Project Alternative would not substantially change existing operations within or near least tern areas and, therefore, would have no impact on biological resources at the Airport. No construction would occur under the No Project Alternative and no ground disturbing activities would take place. However, as the fuel farm would continue to operate in its current capacity, the potential for hazards and hazardous materials impacts would persist. Additionally, although no ground disturbing activities would occur, the potential for undiscovered, contaminated soils to exist in the vicinity of the existing fuel farm would remain. Contamination of soils underlying the existing fuel farm has not been verified and, therefore, would not require remediation unless evidence of contamination is otherwise made apparent. As such, allowing existing soils to remain in situ would neither lessen nor increase the environmental impacts associated with hazards and hazardous materials when compared to the proposed Project. The No Project Alternative would also require the Airport to continue fuel supply supplementation via tanker truck and potentially increase the amount of fuel transferred via tanker truck in the future. As described in Section 5.4.1, a fuel tanker truck operation would substantially increase the number of trips between the SDIA and off-Airport fuel resources; thereby increasing traffic on the local surface transportation network, increasing emissions, and increasing the risk of hazards and hazardous material impacts associated with the transference and distribution of aviation fuel.

---

<sup>5</sup> Burns & McDonnell, *SAN Tanks Project Information*, November 12, 2018.

<sup>6</sup> Burns & McDonnell, *SAN Tanks Project Information*, November 12, 2018.

## 5.5 REJECTED ALTERNATIVES

### 5.5.1 DESCRIPTION OF ALTERNATIVE 2 – MISSION VALLEY TERMINAL

The Mission Valley Terminal is a component of the existing SDIA fuel supply pipeline chain (as shown on Exhibit 5-1), located approximately 5.5 linear miles or approximately 10.4 road miles northeast of the existing SDIA fuel farm, directly adjacent to the San Diego County Credit Union Stadium. The Mission Valley Terminal includes 30 refined product tanks with approximately 28.56 million gallons of storage capacity. Fuels stored within this facility include California Air Resources Board (CARB) Gas, CARB Ultra Low Sulfur Diesel, Ethanol, and Biodiesel, but currently no aviation fuel is stored on site. Although not currently storing aviation fuel, Alternative 2 would include conversion of Tank Mission Valley (MV)-4 from general usage to dedicated aviation fuel storage. Additionally, the existing mothballed filtration train would be put back into service and Truck Rack 3-West would be converted to accommodate the loading of aviation fuel tanker trucks. Tank MV-4 is approximately 74 feet in diameter and 42 feet tall, with a working storage of approximately 980,000 gallons; enough to provide for a two-day backup fuel supply for SDIA in the event of a pipeline disruption.

Under Alternative 2, the proposed MV-4 Tank would receive a minimum of 714,000 gallons per 7.5-day pipeline batch cycle. This volume would then be pumped to Truck Rack 3, for tanker truck loading and then delivered to the SDIA fuel farm unloading facilities. Under Alternative 2, Truck Rack 3 would continue to serve other fuels; meaning, Jet-A (aviation fuel) tanker trucks serving SDIA could possibly be suspended to accommodate various other product being transferred at Mission Valley Terminal. Based on the 710,000-gallon minimum obligation per 7.5-day batch cycle and assuming a maximum tanker truck volume of 7,500 gallons, approximately 95 truck deliveries between the Mission Valley Terminal and SDIA would occur each week, as the fuel could not remain in storage at Mission Valley Terminal. Additional truck traffic would place an added burden on administration and the SDIA fuel farm operator to ensure safe and adequate delivery.

The Mission Valley Terminal receives fuel product via the same pipeline that serves the SDIA fuel farm directly. As such, SDIA would still be at risk of fuel deficiencies or trucked fuel operations as a result of pipeline disruption. Any disruptions that occurs upstream from Mission Valley would result in impacts to SDIA in a manner similar to the No Action Alternative and use of the Mission Valley Terminal would not meet the Project objective of increasing the on-airport fuel supply. The on-airport fuel supply would not be increased; therefore, the restrictions on maintenance of the fuel pipelines, fuel farm tanks, and associated systems would remain. Additionally, under Alternative 2, fuel supplied to SDIA would need to be transmitted to the Airport via tanker truck because there would be no additional storage capacity at SDIA to hold additional fuel. Based on the substantial number of trucks required to deliver fuel reserves, SDIA would need to confirm with local trucking companies that the quantity of fuel trucks (approximately 95 tanker trucks per week) could be accommodated. The risks associated with transporting aviation fuel via tanker truck would also not be resolved. Alternative 2 does not meet Project objectives of providing on-Airport storage capacity commensurate with industry standards, allowing maintenance on the supply pipeline, individual fuel tanks, or the associated ancillary fuel farm systems, or reduce risk of requiring tanker truck delivery of fuel. Therefore, Alternative 2 is not evaluated further in the Draft EIR.

Alternative 2 would not change the existing fuel farm development; therefore, Alternative 2 would have no impact on aesthetics at the proposed Project site. Alternative 2 would not substantially change existing operations within or near least tern areas and, therefore, would have no impact on biological resources at the Airport. No construction would occur under Alternative 2 and no ground disturbing activities would take place. However, as the fuel farm would continue to operate in its current capacity, the potential for hazards and hazardous materials impacts would persist. Additionally, although no ground disturbing activities would occur, the potential for undiscovered,

contaminated soils to exist in the vicinity of the existing fuel farm would remain. Contamination of soils underlying the existing fuel farm has not been verified and, therefore, would not require remediation unless evidence of contamination is otherwise made apparent. As such, allowing existing soils to remain in situ would neither lessen nor increase the environmental impacts associated with hazards and hazardous materials when compared to the proposed Project. Alternative 2 would also require the Airport to continue fuel supply supplementation via tanker truck and potentially increase the amount of fuel transferred via tanker truck in the future. As described in Section 5.4.1, a fuel tanker truck operation would substantially increase the number of trips between the SDIA and off-Airport fuel resources; thereby increasing traffic on the local surface transportation network, increasing emissions, and increasing the risk of hazards and hazardous material impacts associated with the transference and distribution of aviation fuel.

### 5.5.2 DESCRIPTION OF ALTERNATIVE 3 – OFF-AIRPORT FUEL TANK

Construction of additional fuel storage and installation of an associated supply pipeline off-Airport would theoretically increase the Airport's fuel supply; however, off-airport capacity would fail to meet the Project objectives. Furthermore, the Airport is located in a highly urbanized area and locating a development site large enough to accommodate fuel storage facilities sized to meet SDIA's needs would be problematic. Safety and health requirements, as well as zoning and land use restrictions, limit the locations at which a fuel facility could be located in proximity to the Airport. Transference of fuel from an off-Airport site to the Airport may require construction of a new fuel supply pipeline or implementation of trucked fuel operations. Financial and logistical challenges, including cost of land and construction of new supply pipeline connections would also make Alternative 3 infeasible.

The potential for undiscovered, contaminated soils at or near the existing fuel farm would remain in the instance an off-airport fuel storage facility was to be constructed. Contamination of the soils underlying the existing fuel farm has not been verified and, therefore, would not require remediation unless evidence of contamination is otherwise made apparent. Allowing existing soils to remain in situ would neither reduce nor increase the environmental impacts associated with hazards and hazardous materials when compared to the proposed Project. Alternative 3 would not meet the Project objectives of providing on-Airport storage capacity commensurate with industry standards, allowing maintenance on the supply pipeline, individual fuel tanks, or the associated ancillary fuel farm systems, reduce risk of requiring tanker truck delivery of fuel, or reduce risks associated with trucked fuel operations. Therefore, Alternative 3 does not meet Project objectives and is not evaluated further in the Draft EIR.

## 5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project Alternative would avoid many of the environmental effects associated with the proposed Project, all of which would be reduced to less than significant under the proposed Project through compliance with existing laws and regulations, and through implementation of construction best management practices that would be incorporated into the Project proposal. The No Project Alternative would not change the existing fuel farm development; therefore, the No Project Alternative would have no impact on aesthetics at the proposed Project site. The No Project Alternative would not substantially change existing operations within or near least tern areas and, therefore, would have no impact on biological resources at the Airport.

In the absence of the Project, the site's existing conditions, including the potential for contaminated soils would persist. Contaminated soils could remain undetected under the No Project Alternative and the two other rejected alternatives; therefore, the benefits associated with the proposed Project, including potential soil remediation, cannot definitively be evaluated when compared to the alternatives. Thus, the No Project Alternative, the Mission Valley Terminal Tanks alternative, and the Off-Airport Fuel Tank alternative avoid the adverse impacts of the



proposed Project that would be reduced to less-than-significant levels, through the proposed Project, and would not provide the potential environmental benefits of the proposed Project. The No Project Alternative, the Mission Valley Terminal Tanks Alternative, and the Off-Airport Fuel Tank Alternative would also require as-needed or regular trucked fuel operations, thereby increasing inefficiency of fuel supply to SDIA and increasing operational emissions associated with the Airport. As such, the proposed Project has been identified as the environmentally superior alternative.

## 6. PUBLIC INVOLVEMENT, PREPARERS, AND REFERENCES AND ACRONYMS

### 6.1 PUBLIC INVOLVEMENT

An NOP for the proposed Project was published on November 28, 2018 and the public comment period concluded on December 28, 2018. A total of 10 comment letters in response to the NOP were received from government agencies, a Native American tribal representative, and private citizens. The CEQA-related comments included suggestions for the consideration of alternatives to specific fuel tank and associated infrastructure technologies; project siting preferences; concerns regarding containment plans and features; requests for a detailed analysis of aesthetics, geologic features and fault zones, biological and coastal resources, and hazards and hazardous materials; and requests that identification and detailed discussion of project components, including the fire suppression system and construction haul routes, be included in the Draft EIR. Where appropriate, CEQA-related comments have been incorporated into this Draft EIR. Copies of the scoping comments are included as part of Appendix C.

### 6.2 LIST OF PREPARERS

#### 6.2.1 LEAD AGENCY

San Diego County Regional Airport Authority  
Third Floor, SDCRAA Administration Building  
3225 North Harbor Drive  
San Diego, California 92101

- Ted Anasis, Manager, Airport Planning
- Richard Gilb, Manager, Environmental Affairs
- Kim Sheredy, Senior Airport Planner
- Lynda Tamura, Assistant Airport Planner

#### 6.2.2 DRAFT EIR PREPARATION

Ricondo & Associates, Inc.  
1917 Palomar Oaks Way, Suite 350  
Carlsbad, California 92008

- Stephen Culberson, Vice President
- Avant Ramsey, AICP, Managing Consultant
- Jason Apt, Managing Consultant
- Brian Philiben, Senior Consultant
- David Plakorus, LEED Green Associates, ENV SP, Senior Consultant

CDM Smith, Inc.  
111 Academy Way, Suite 350  
Irvine, California 92617

- Tony Skidmore (reviewer)

JBG Environmental Consulting  
4368 Niagara Avenue  
San Diego, California 92107

■ Julie Gaa (reviewer)

## 6.3 REFERENCES AND ACRONYMS

### 6.3.1 REFERENCES

16 U.S. Code, Sections 1531-1544, as amended, *Endangered Species Act of 1973*.

Argus, *Engineering Study for SAN Supply Chain*, July 2017.

Burns & McDonnell, *SAN Tanks Project Information*, November 12, 2018.

Burns McDonnell Engineering Company, Inc., *Basis of Design Report – SAN Fuel Committee – SAN Additional Fuel Tanks Project (No. 99965)*, March 2019.

California Department of Fish and Wildlife, *California Least Tern Breeding Survey – 2015 Season*, March 30, 2016. Available: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=122436>.

California Department of Toxic Substances Control, *EnviroStor Website*: <https://www.envirostor.dtsc.ca.gov/public/> (accessed February 2019).

California State Water Resources Control Board, *GeoTracker Website*: <http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=San+Diego> (accessed April 2019).

Centre City Development Corporation, *San Diego Downtown Community Plan – Rising on the Pacific*, Adopted April 2006, last amended 2016. Available: <http://civicsd.com/departments/planning/planning-regulatory-documents/>.

City of San Diego, *Capital Improvements Program*. Available: <https://www.sandiego.gov/cip> (accessed August 2019).

City of San Diego, *Midway-Pacific Highway Community Plan*, September 17, 2018. Available: [https://www.sandiego.gov/sites/default/files/midway\\_-\\_pacific\\_highway\\_community\\_plan\\_sept\\_2018\\_0.pdf](https://www.sandiego.gov/sites/default/files/midway_-_pacific_highway_community_plan_sept_2018_0.pdf).

City of San Diego, *Peninsula Community Plan and Local Coastal Program Land Use Plan*, July 14, 1987, last amended 2011. Available: <https://www.sandiego.gov/planning/community/profiles>.

City of San Diego, *Uptown Community Plan*, November 14, 2016, as amended June 12, 2018. Available: <https://www.sandiego.gov/planning/community/profiles>.

City of San Diego, *Utilities Undergrounding Program*. Available: <https://www.sandiego.gov/undergrounding> (accessed August 2019).

City of San Diego, *Zoning Grid Map* - <https://www.sandiego.gov/development-services/zoning-maps/grid-map> (accessed April 2019).

City of San Diego Development Services Department, *California Environmental Quality Act Significance Determination Thresholds*, July 2016.

Kleinfelder, *Fault Hazard Study CIP 400002B ADP-Programmatic Documents-ADC San Diego International Airport San Diego, California, Kleinfelder Project No. 20174291.001A*, Prepared for San Diego County Regional Airport Authority, May 22, 2017.

Port of San Diego, *Port Master Plan - Discussion Draft*, April 2019. Available:  
<https://www.portofsandiego.org/waterfront-development/integrated-planning-port-master-plan-update>.

San Diego County Regional Airport Authority, *Air Traffic Report Summary, Calendar Year 2018*. Available:  
[https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core\\_Download&language=en-US&PortalId=0&TabId=403](https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12717&Command=Core_Download&language=en-US&PortalId=0&TabId=403) (accessed March 15, 2019).

San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.1 - Aesthetics and Visual Resources*, September 2019.

San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.5 – Biological Resources*, September 2019.

San Diego County Regional Airport Authority, *Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan, Section 3.8 – Geology and Soils*, September 2019.

San Diego County Regional Airport Authority, *San Diego International Airport Master Plan Final Environmental Impact Report, Section 5.15 - Hazards and Hazardous Materials*, April 2008.

San Diego County Regional Airport Authority, *SAN Stormwater Management Plan*, June 2015, amended January 2019. Available:  
[https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12857&Command=Core\\_Download&language=en-US&PortalId=0&TabId=183](https://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=12857&Command=Core_Download&language=en-US&PortalId=0&TabId=183).

San Diego Natural History Museum, *RE: Survey for Nuttall's Acmispon at the California Least Tern nesting ovals at San Diego International Airport (SDIA)*, April 6, 2018.

San Diego Unified Port District, *Port Master Plan Update Discussion Draft – Port of San Diego*, 2019. Available:  
<https://pantheonstorage.blob.core.windows.net/waterfront-development/Port-Master-Plan-Update-Discussion-Draft-042419.2-Port-of-San-Diego.pdf>.

State of California, *California Endangered Species Act*, California Fish and Game Code, Section 2050 et. seq.

State of California, *California Native Plant Protection Act*, California Fish and Game Code, Sections 1900-1913.

State of California, *Guidelines for California Environmental Quality Act (State CEQA Guidelines)*, California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.

State of California, Public Resource Code, Division 20. *California Coastal Act* [Section 30000, et. Seq.].

Title 40, Code of Federal Regulations, Part 112.7, *General Requirements for Spill Prevention, Control, and Countermeasure Plans*.

Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Report No. 79 – Evaluating Airfield Capacity*, 2012.

U.S. Department of the Interior, Fish and Wildlife Service, Ecological Services, Carlsbad Field Office, *Biological Opinion on the Immediate Action Program, Lindbergh Field Facilities Improvements, San Diego International Airport, San Diego, California*, July 16, 1993.

U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports*, 2007.

U.S. Department of Transportation, Federal Aviation Administration, *Airport Compliance Manual – Order 5190.6B*, September 2009.

U.S. Department of Transportation, Federal Aviation Administration, *National Part 139 CertAlert No. 190-01, Aqueous Film Forming Foam (AFFF) Testing at Certificated Part 139 Airports*, January 17, 2019.

Wilson Geosciences Inc., *Seismic and Geologic Technical Background Report for the City of San Diego Midway-Pacific Highway and Old Town Community Plan Updates, and Environmental Impact Report, City of San Diego, San Diego County, California*, April 2012.

Wood Environment & Infrastructure Solutions, Inc., *Subject: Results of the Wetlands Assessment Survey at the San Diego International Airport, San Diego, California*, August 2019.



### 6.3.2 ACRONYMS

#### A

---

AC—Advisory Circular  
 ACM—Asbestos containing materials  
 ADP—Airport Development Plan  
 AFFF—Aqueous film forming foam  
 AIA—Airport Influence Area  
 ALP—Airport Layout Plan  
 ALUC—Airport Land Use Commission  
 ALUCP—Airport Land Use Compatibility Plan  
 AOA—Air Operations Area  
 APCD—San Diego County Air Pollution Control District  
 ARFF—Aircraft Rescue and Fire Fighting  
 ATCT—Airport Traffic Control Tower

#### B

---

BMP—Best Management Practices  
 BO—Biological Opinion

#### C

---

CalARP—California Accidental Release Program  
 CalEPA—California Environmental Protection Agency  
 CalOSHA—California Division of Occupational Safety and Health  
 Caltrans—California Department of Transportation  
 CARB—California Air Resources Board  
 CBSC—California Building Standards Code  
 CCA—California Coastal Act  
 CCR—California Code of Regulations  
 CDFW—California Department of Fish and Wildlife  
 CEQA—California Environmental Quality Act  
 CERCLA—Comprehensive Environmental Response, Compensation, and Liability Act  
 CERS—California Environmental Reporting System  
 CESA—California Endangered Species Act  
 CFR—Code of Federal Regulations  
 CHP—California Highway Patrol  
 CPA—Community Planning Area

CUP—Central Utility Plant  
 CUPA—Certified Unified Program Agency  
 CWA—Clean Water Act

#### D

---

DEH—County of San Diego Department of Environmental Health  
 DTSC—California Department of Toxic Substances Control

#### E

---

EIR—Environmental Impact Report  
 EPCRA—Emergency Planning and Community Right-to-Know Act  
 ESA—Endangered Species Act  
 ESHA—Environmentally Sensitive Habitat Areas

#### F

---

FAA—Federal Aviation Administration  
 FBO—Fixed base operator  
 FIS—Federal Inspection Services  
 FMD—Facilities Management Department

#### G

---

GSE—Ground support equipment

#### H

---

H&SC—California Health & Safety Code  
 HAZMIT—San Diego County Multi-Jurisdictional Hazard Mitigation Plan  
 HMBP—Hazardous Materials Business Program  
 HMD—Hazardous Materials Division (of the County of San Diego Department of Environmental Health)  
 HMMP—Hazardous Materials Management Plan

#### I

---

#### J

---

#### K

---

---

**L**

---

---

**M**

---

MBTA—Migratory Bird Treaty Act  
MCRD—U.S. Marine Corps Recruit Depot  
MMRP—Mitigation Monitoring and Reporting Program  
MV—Mission Valley

---

**N**

---

NAHC—Native American Heritage Commission  
NEPA—National Environmental Policy Act of 1969  
NFPA—National Fire Protection Association  
NIMS—National Incident Management System  
NMFS—National Marine Fisheries Service  
NOP—Notice of Preparation  
NPDES—National Pollutant Discharge Elimination System  
NPPA—California Native Plant Protection Act

---

**O**

---

OA EOP—San Diego County Operational Area Emergency Operations Plan  
OFA—Object-free area  
OSHA—Occupational Safety and Health Administration

---

**P**

---

PFAS—per- and polyfluoroalkyl substances  
PMP—Port (District) Master Plan  
PMPU—Port (District) Master Plan Update  
Proposition 65—Safe Drinking Water and Toxic Enforcement Act

---

**Q**

---

---

**R**

---

RCRA—Resource Conservation and Recovery Act  
RDC—Receiving and Distribution Center  
RMP—Risk Management Plan  
RON—Remain overnight  
RWQCB—Regional Water Quality Control Board

---

**S**

---

SARA—Superfund Amendments and Reauthorization Act  
SDCRAA—San Diego County Regional Airport Authority  
SDFD—San Diego Fire Department  
SDIA—San Diego International Airport  
SEMS—Standardized Emergency Management System  
SERC—State Emergency Response Commission  
SPCC—Spill Prevention Control and Countermeasure  
SWMP—Stormwater Management Plan  
SWPPP—Stormwater Pollution Prevention Plan  
SWRCB—State Water Resources Control Board

---

**T**

---

T1—Terminal 1  
T2—Terminal 2

---

**U**

---

U.S.C—United States Code  
USEPA—U.S. Environmental Protection Agency  
USFWS—U.S. Fish and Wildlife Service  
UST—Underground Storage Tank

---

**V**

---

---

**W**

---

---

**X**

---

---

**Y**

---

---

**Z**

---