DRAFT
ENVIRONMENTAL IMPACT REPORT

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

ADDITIONAL FUEL TANKS PROJECT

SAN DIEGO INTERNATIONAL AIRPORT

APPENDICES

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

NOVEMBER 2019

APPENDIX A

Initial Study for the Additional Fuel Tanks Project

A.1 | INITIAL STUDY

A.2 | AIR QUALITY ANALYSIS

September 2019

San Diego International Airport

Initial Study for the Additional Fuel Tanks Project

Prepared for:

San Diego County Regional Airport Authority

Prepared by:

RICONDO

In association with:

CDM Smith, Inc.

JBG Environmental Consulting

Ricondo & Associates, Inc. (Ricondo) prepared this document for the stated purposes as expressly set forth herein and for the sole use of the San Diego County Regional Airport Authority and its intended recipients. The techniques and methodologies used in preparing this document are consistent with industry practices at the time of preparation and this Report should be read in its entirety for an understanding of the analysis, assumptions, and opinions presented. Ricondo & Associates, Inc. is not registered as a municipal advisor under Section 15B of the Securities Exchange Act of 1934 and does not provide financial advisory services within the meaning of such act.

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SUMMARY AND DETERMINATION

DETERMINATION (To be completed by Lead Agency)	
On the basis of this initial evaluation:	
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
TED ANASIS	**Manager of Airport Planning** **San Diego County Regional Airport Authority**
SIGNATURE	**TITLE**

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☒	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☒	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☒	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☒	Mandatory Findings of Significance

INITIAL STUDY CHECKLIST	
PROPONENT NAME San Diego County Regional Airport Authority	**PHONE NUMBER** (619) 400-2404
PROPONENT ADDRESS – Street Address Third Floor, SDCRAA Administration Building 3225 North Harbor Drive San Diego, California 92101	**Mailing Address** P.O. Box 82776 San Diego, California 92138-2776
PROPOSAL NAME San Diego International Airport – Additional Fuel Tanks Project	**DATE SUBMITTED**

1. INTRODUCTION

This Initial Study has been prepared by the San Diego County Regional Airport Authority (SDCRAA or Airport Authority), acting in its capacity as the lead agency under the California Environmental Quality Act (CEQA), to determine whether the implementation of the Additional Fuel Tanks Project (the proposed Project) at San Diego International Airport (SDIA or the Airport) may result in a significant effect on the environment, pursuant to the CEQA Statute and Guidelines.[1,2] Following review of this Initial Study, if the Airport Authority, as the lead agency, determines that there is "substantial evidence that any aspect of the [Additional Fuel Tanks Project at SDIA], either individually or cumulatively, may cause a significant effect on the environment", an EIR shall be prepared.[3] If the Airport Authority determines that an EIR is required, this Initial Study will assist in preparing the EIR by: (1) focusing the EIR on the environmental effects determined to be potentially significant; (2) identifying the effects determined not to be significant; and (3) explaining the reasons for determining that potentially significant effects would not be significant.[4]

The Airport Authority intends for this Initial Study to satisfy the content requirements of CEQA Guidelines Section 15063, subdivision (d)(1)-(6). Based on the analysis contained in this Initial Study, the Airport Authority has determined that potentially significant impacts may result from construction and operation of the Additional Fuel Tanks Project relative to aesthetics, biological resources, and hazards and hazardous materials, and their related cumulative impacts. The Airport Authority has also determined, based on the analysis in this Initial Study, that implementation of the Additional Fuel Tanks Project would result in no impacts or less than significant impacts to all other environmental impact categories.

The Airport Authority will prepare a Draft EIR to further analyze the Additional Fuel Tanks Project's potential environmental impacts relative to aesthetics, biological resources, and hazards and hazardous materials, and their related cumulative impacts. No other environmental impact categories will be further analyzed in the EIR.

Project Title

San Diego International Airport – Additional Fuel Tanks Project

Lead Agency Name and Address

San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

[1] California Public Resources Code §21000 et seq.

[2] California Code of Regulations, Title 14, §15000 et seq.

[3] CEQA Guidelines §15063, subdivision (b)(1).

[4] CEQA Guidelines §15063, subdivision (c)(3).

Contact Person and Phone Number

Ted Anasis
Manager, Airport Planning
San Diego County Regional Airport Authority
3225 North Harbor Drive
San Diego, CA 92101
(619) 400-2478

Project Location

SDIA and the surrounding area, San Diego County, California

Project Sponsor Name and Address

San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

Project Site

The Project site is within SDIA property adjacent to the site of the existing SDIA fuel farm between W. Washington Street and Guantanamo Street, as depicted on **Exhibit 1-1**.

The state, regional, and local land use plans, policies, and regulations relevant to the Project site and surrounding area are listed and discussed in Section 3.2.

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 1-1

NORTH 0 1,500 ft

PROJECT LOCATION

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2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The Airport Authority operates SDIA, a large hub airport serving San Diego County, California and the surrounding area. The Airport Authority has granted a fuel lease to the airlines who operated at SDIA, which allows the airlines to operate, maintain and manage all components of an existing fuel storage and distribution system ("fuel farm") at SDIA. Allied Aviation Service, Inc. is currently contracted, by the SDIA airlines, to maintain and operate the fuel farm. The fuel farm ensures aviation fuel is immediately and equitably available to aircraft operators at SDIA and, in the event the supply of fuel to the Airport is interrupted, ensures scheduled aircraft operations can continue for several days. The existing fuel farm, constructed in the early 1990s, contains two aviation fuel storage tanks (fuel tanks) and is supplied by regional refineries via the existing Airport fuel delivery pipeline (see **Exhibit 2-1**).[5] Any significant lapse in the service from the fuel delivery pipeline or the on-airport fuel delivery system, including inspection and maintenance activities, requires fuel to be delivered via tanker truck. Tanker truck refueling operations require substantial tanker truck fleets, results in significantly slower and less reliable replenishment of the fuel farm supply, increases in traffic due to fuel deliveries, and contributes to air pollution and greenhouse gases.

Passenger levels at SDIA increased approximately 20 percent between 2012 and 2017, accommodated by an increase in daily aircraft operations and the use of larger aircraft with higher seating capacity.[6] 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 had the capacity to supply approximately 2 days of fuel.[7] The industry standard for airports similar to SDIA is a 5- to 7-day supply of fuel.

Following construction of the existing fuel tanks in 1995, fuel was delivered via approximately 44 daily fuel tanker truck deliveries.[8] Subsequently, a fuel delivery pipeline between the fuel farm and the 10th Avenue Marine Station fuel distribution center was constructed, thereby eliminating the need for regular tanker truck deliveries. The limited fuel supply capacity during current peak periods exposes SDIA to the risk of reverting to replenishing fuel supplies via tanker truck if the fuel delivery pipeline is compromised, disrupted, or shut down for maintenance. Due to the increase in aviation fuel demand at SDIA, replenishment of aviation fuel via tanker trucks would require a substantial trucking operation, which is discussed in detail in the SDIA Additional Fuel Tank Project EIR.

The airlines are proposing the construction of three additional fuel tanks at the existing fuel farm to meet the industry standards for on-airport aviation fuel reserves (the proposed Project). 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 additional fuel tanks would be constructed adjacent to the two existing fuel tanks at the SDIA fuel farm, which would remain in operation (see **Exhibit 2-2**).

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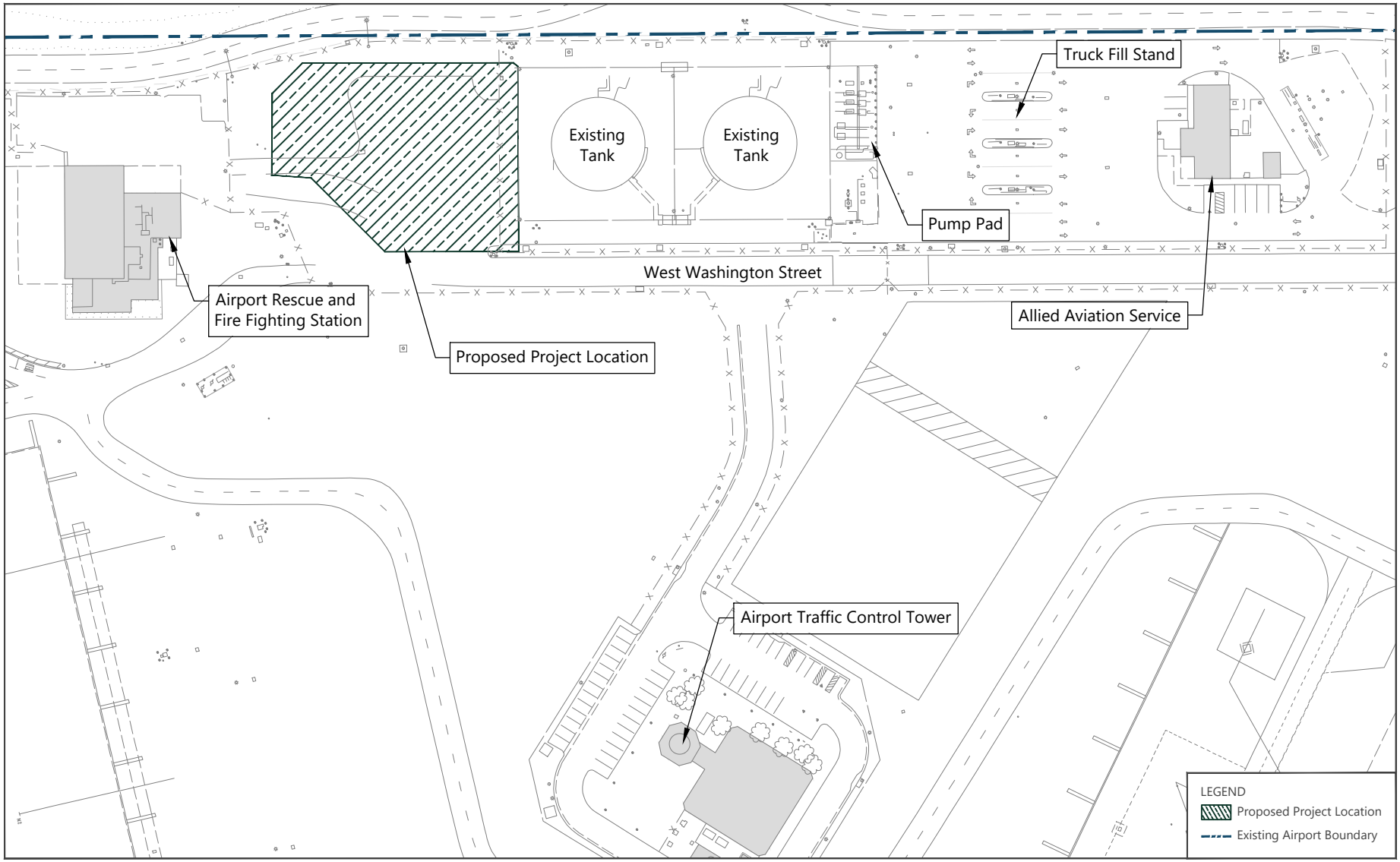
[5] Argus, *Engineering Study for SAN Supply Chain*, July 2017.

[6] San Diego County Regional Airport Authority, *Draft Environmental Impact Report - Airport Development Plan, San Diego International Airport, Chapter 2 – Project Description,* July 2018.

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

[8] San Diego Unified Port District, *Final Environmental Impact Report – Airport Fuel Farm Relocation: Lindbergh Field*, May 1991.



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

NORTH 0 125 ft.

EXHIBIT 2-1

EXISTING FUEL FARM

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project_20190319.dwgLayout: 2-1 Plotted: Apr 18, 2019, 12:37PM

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

NORTH 0 75 ft.

EXHIBIT 2-2

PROPOSED PROJECT SITE PLAN

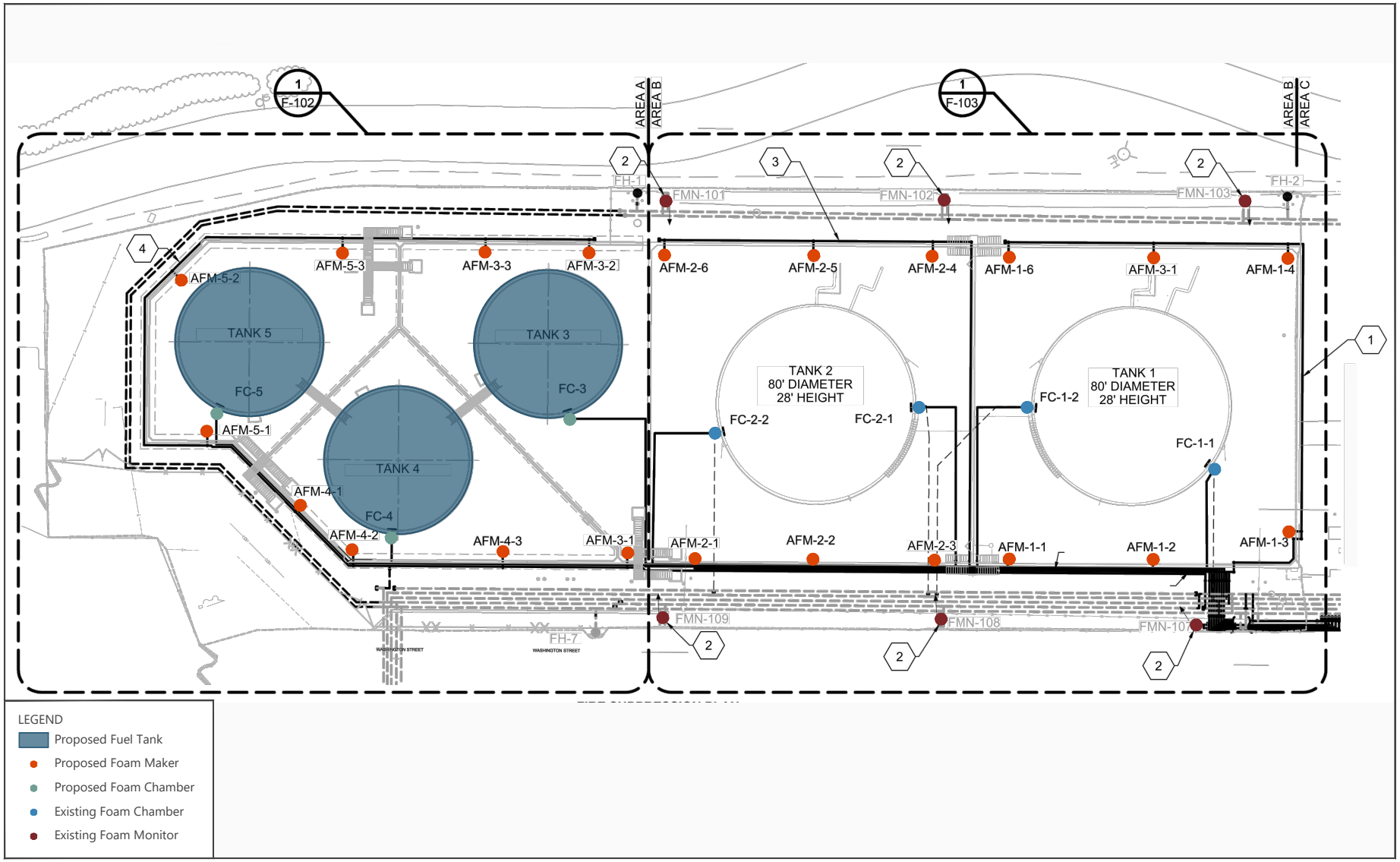
Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project_20190319.dwgLayout: 2-2 Plotted: Apr 18, 2019, 12:41PM

The Airport Authority has determined, based on the analysis in the following Initial Study, that construction and operation of the proposed fuel tanks would result in no impact or less than significant impacts to all environmental impact categories with the exception of aesthetics, biological resources, and hazards and hazardous materials, and their related cumulative impacts. The impact categories the proposed Project could potentially and significantly impact were carried forward for further analysis in a Draft EIR.

2.2 PROJECT CHARACTERISTICS

The proposed Project comprises the construction of three fuel tanks; concrete containment dike area improvements (construction of individual, connected containment dike walls); and associated utility and site improvements, including expansion of the existing fire suppression system (see **Exhibit 2-3**). The proposed construction would be completed in approximately 17 months. The proposed Project would be constructed immediately adjacent to the two existing fuel tanks to maximize use of existing infrastructure and safety systems associated with fuel storage and distribution at the Airport. Components of the proposed Project include:

- Site preparation, including:
  - Removal of existing pavement; low, sparse brush and grass; and debris
  - Installation of new drainage connections
  - Utility updates, as necessary
  - Ground improvements associated with seismic stability and foundational support
- Construction of three 1,146,320-gallon fuel tanks, each approximately 58 feet in diameter and height, with an effective storage capacity of approximately 966,000 gallons
- Installation of low-suction transfer piping to interconnect the proposed and existing fuel tanks
- Construction of six-foot tall secondary containment dike walls east, west and south of the proposed fuel tanks (see Exhibit 2-3)
- Construction of 18-inch tall intermediate dike walls to reduce risk to individual fuel tanks in the event of a catastrophic tank failure.
- Modification of the existing southern secondary containment dike wall to serve as an intermediate dike wall
- Enhancement of the existing fire suppression system (see Exhibit 2-3):
  - Installation of nine foam makers around the periphery of the proposed fuel tanks within the expanded containment dike area
  - Installation of 12 foam makers around the periphery the fuel tanks existing containment dike area
  - Installation of modern nozzles on existing foam monitors



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

NORTH 0 60 ft.

EXHIBIT 2-3

PROPOSED FIRE SUPPRESSION SYSTEM ELEMENTS

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project_20190319.dwgLayout: 2-3 Plotted: Apr 18, 2019, 12:41PM

The existing fuel farm comprises two 80-foot diameter, 28-foot tall, 1,000,000-gallon fuel tanks, with a combined effective storage capacity of approximately 1,713,600 gallons of fuel. The Airport's fuel supply is replenished, via the existing Airport fuel delivery pipeline, at 7.5-day intervals.[9] Aircraft fuel from the fuel farm is distributed through the use of fuel trucks that service aircraft where they are parked, including at terminal gates. The fuel trucks fill up at a fueling station located adjacent to the existing fuel farm and at a fuel rack location approximately 400 feet north of the Airport Administration Offices. The proposed Project would construct three 1,146,320-gallon fuel tanks, with an effective capacity of approximately 966,000 gallons each, adding 2,898,000 gallons of on-airport fuel capacity. Each proposed tank would extend approximately 58 feet in diameter and height. Low-suction transfer piping would be installed to interconnect the proposed and existing fuel tanks to aid in the transfer of fuel between tanks during tank inspection and maintenance. The proposed fuel tanks would increase the existing aviation fuel supply from 2 days to approximately 6 days during peak aviation activity periods.

Secondary containment dike walls enclose both existing fuel tanks, as shown in Exhibit 2-2, 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. However, an expanded containment dike area would be required to protect against failure of one of the proposed fuel tanks at full volume. .[10] Accordingly, the proposed Project would include the construction of six-foot secondary containment dike walls around the perimeter of the proposed fuel tanks. The proposed secondary containment dike walls would be connected to the fuel farm's existing secondary containment dike walls to create an expanded containment area. The proposed Project would also include the construction of intermediate dike walls between each proposed fuel tank to individual fuel tanks within the containment area in the event of a tank failure. The height of the southern existing containment dike wall would be reduced to serve as an intermediate containment wall. The remaining existing containment dike walls would not be modified (see Exhibit 2-2).

The proposed Project would include enhancement of, and additions to, the existing fire suppression system. The existing fire suppression system, comprised of six foam monitors, would be updated in-place with modern nozzles. Twenty-one foam makers 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 expanded containment dike area and 12 additional foam makers would be installed within the existing dike area surrounding the existing fuel tanks. The proposed foam makers would be integrated into the existing fire suppression control system. 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.[11] The California Fire Code overlaps with and adheres to the International Fire Code, the International Building Code, and National Fire Protection Association (NFPA) requirements.

Site preparation and improvements would be required prior to construction and subsequent operation. Site preparation would include removal of existing pavement; low, sparse brush and grass; and other debris. The proposed Project would include new stormwater drainage connections to accommodate the expanded fuel farm and containment dike area. Existing utilities would necessarily be identified and relocated to accommodate fuel tank

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

[10] Burns & McDonnell, *San Diego International Airport Application for Tenant Improvement Project Approval – Attachment No. 4*, September 29, 2017.

[11] 24 California Code of Regulations, Part 9 – California Fire Code, Chapter 9 (Fire Protection Systems), and Chapter 20 (Aviation Facilities), effective January 1, 2017.

and dike wall foundations and seismic ground improvements. Ground improvements, required for seismic stability and foundational support for the proposed tanks, would be completed via compaction grouting.

The proposed Project would furnish three additional fuel tanks at the existing SDIA fuel farm to provide storage capacity sufficient to supply fuel for 6 days of aircraft operations during the peak aviation activity month (July). The purpose of the increase in fuel storage capacity is to accommodate existing aviation activity and allow fuel farm maintenance activities. The proposed Project would not increase the number of passengers 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.[12] Within the existing SDIA airfield capacity, any growth in number of passengers or aircraft operations would occur regardless of on-airport fuel capacity. In the instance the proposed Project is not constructed, airline companies would be reliant on trucked fuel deliveries to supplement on-Airport fuel shortfalls in the event of interruption of the Airport fuel delivery pipeline supplying the fuel farm due to maintenance or emergency stoppages.

2.3 REQUIRED APPROVALS AND CONSULTATIONS

The SDCRAA is the lead agency for the Additional Fuel Tanks Project Environmental Impact Report (EIR) at SDIA and is the "public agency which has the principal responsibility for carrying out or approving [the] project."[13] As the lead agency, the Airport Authority is responsible for conducting environmental review of SDIA projects under the CEQA Statute and Guidelines. There are no responsible agencies for the project because no other agency has discretionary approval power over the proposed Project or would carry out the project. However, as defined by Section 15366 of the CEQA Guidelines, the City of San Diego, San Diego County, and the California Coastal Commission all have "jurisdiction by law" over the project as each local agency has primary jurisdiction over areas or activities within the Additional Fuel Tanks Project area.[14] Accordingly, each of these agencies and districts have been provided with a copy of this Initial Study. The Airport would be required to obtain a Unified Program Facility Program Permit from the San Diego County Hazardous Materials Division, in the role of the Certified Unified Program Agency, to operate the proposed additional fuel tanks.

[12] Airport Cooperative Research Program, *Report No. 79 – Evaluating Airfield Capacity*. 2012.

[13] California Code of Regulations, Title 14, §15367; Public Resources Code, §21067.

[14] California Code of Regulations, Title 14, §15366 Subdivisions (b) and (c).

3. ENVIRONMENTAL SETTING

3.1 INTRODUCTION

SDIA is in southwestern San Diego County, in the northwest portion of the City of San Diego's downtown area. The Airport is generally bounded by North Harbor Drive and the 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 (I-5) to the east. Land in the vicinity of the Airport is densely developed and the Airport site is constrained by the San Diego Bay and surrounding development. **Exhibit 3-1** depicts the regional location of the Airport.

3.2 RELATIONSHIP TO EXISTING PLANS AND DOCUMENTS

The existing plans and documents that are relevant to the Airport and the Project site are described below.

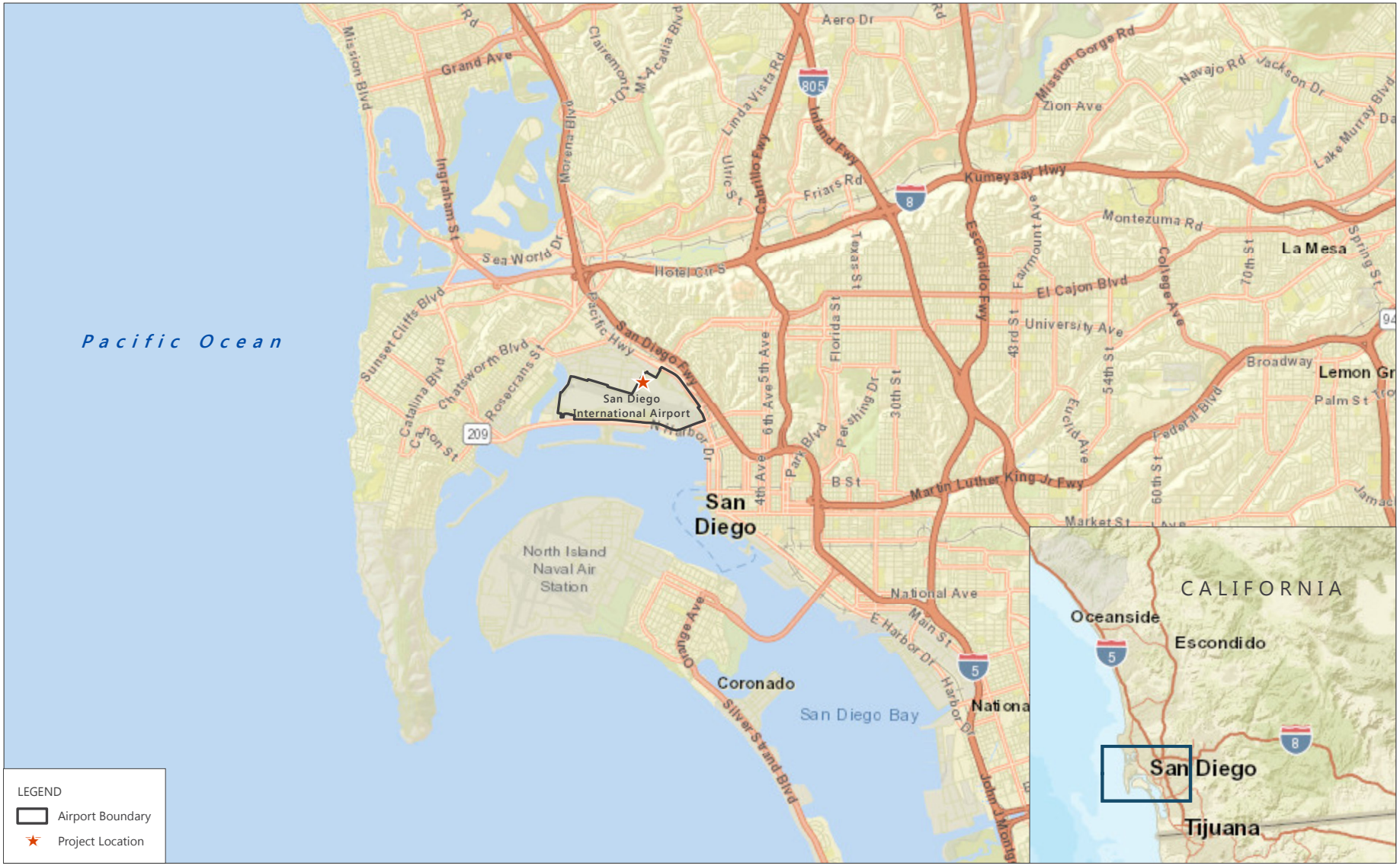
3.2.1 CALIFORNIA PUBLIC TRUST DOCTRINE

The Public Trust Doctrine is a legal doctrine that governs the use of tide and submerged lands in California, including former tide and submerged lands that have been filled. Public Trust lands are required to be used for purposes defined in and protected by the Common Law doctrine of the Public Trust, which include commerce, navigation, fisheries, and other recognized uses, for their preservation in their natural state. Lands subject to the Public Trust are held in trust by the state on behalf of the public.

The state enabling legislation that created the San Diego Unified Port District (the Port District) also conveyed and granted, in trust to the Port District, the tidelands and submerged lands surrounding San Diego Bay. This includes the lands upon which SDIA is situated, with the exception of a narrow strip of land along Pacific Highway, at the northern edge of the property, that is not designated as "tidelands." The SDIA property, while under the control and jurisdiction of SDCRAA, remains in the Public Trust held by the Port District. Therefore, any proposed land uses by SDCRAA must be consistent with the proposed uses for those lands held in trust by the Port District.

The San Diego Unified Port District Act provides the official planning policies, consistent with the Public Trust Doctrine, for the physical development of the tidelands and submerged lands conveyed and granted in trust to the Port District. The San Diego Unified Port District Act identifies statewide purposes for uses of tide and submerged lands held in trust by the Port District, including airports and airport support facilities. Specifically, Section 87(a) of the San Diego Unified Port District Act identifies the following purposes of use relevant to the Airport and the proposed Project:

- The tide and submerged lands conveyed to the district by any city included in the district shall be held by the district and its successors in trust and may be used for purposes in which there is a general statewide purpose, as follows:
  - For the establishment, improvements, and conduct of airport and heliport or aviation facilities, including, but not limited to, approach, takeoff, and clear zones in connection with airport runways, and for the construction, reconstruction, repair, maintenance, and operation of terminal buildings, runways, roadways, aprons, taxiways, parking areas, and all other works, buildings, facilities, utilities, structures, and appliances incidental, necessary, or convenient for the promotion and accommodation of air commerce and air navigation.



SOURCES: San Diego County Regional Airport Authority, *Airport Layout Plan*, 2009 (Airport property); Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, OpenStreetMap Contributors, and the GIS User Community, November 2018 (basemap).

NORTH 0 2 mi

EXHIBIT 3-1

REGIONAL LOCATION

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3.2.2 CALIFORNIA COASTAL ACT

The California Coastal Act (CCA) was enacted to establish policies and guidelines that provide direction for the conservation and development of the California coastline and administering the federal Coastal Zone Management Act. The California Coastal Commission (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 through the state Coastal Commission. 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. The entirety of SDIA lies within the coastal zone. Applicable developmental 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.

3.2.3 SAN DIEGO FORWARD: THE REGIONAL PLAN

Adopted by the San Diego Association of Governments (SANDAG), San Diego Forward: The Regional Plan[15] provides a vision and implementation plan for growth in the San Diego region by 2050. Specific to the Airport, the Regional Plan identifies SDIA as providing critical infrastructure for regional mobility and movement of goods. A key component identified in the Regional Plan is coordination between SANDAG and SDCRAA on aviation and transit planning to maximize the efficiency and effectiveness of existing and planned aviation facilities. The coordination includes a goal to develop plans for an Intermodal Transit Center (ITC) adjacent to SDIA, ground access plans, and direct connector ramps to improve access to and from SDIA.

3.2.4 REGIONAL AVIATION STRATEGIC PLAN

The Regional Aviation Strategic Plan (RASP),[16] prepared by SDCRAA, identified long-term transportation needs and evaluated a range of potential improvements and changes to airports in San Diego County with the goal of improving the performance of the regional airport system. Potential regional strategies considered included full build-out of facilities at SDIA, introducing or enhancing passenger service at other airports in the region (i.e., Brown Field Municipal Airport, McClellan-Palomar Airport), improving access to Tijuana Rodriguez International Airport, considering alternative ground transportation options (i.e., high speed rail), or optimizing general aviation and/or air cargo operations at facilities other than SDIA to maximize use of SDIA for commercial passenger activity. Specific to SDIA, the RASP identified that even with full build-out, passenger capacity of SDIA can only marginally be improved due to site constraints.

3.2.5 AIRPORT MULTIMODAL ACCESSIBILITY PLAN

The Airport Multimodal Accessibility Plan (AMAP),[17] prepared by SANDAG, identified ground access improvements alternatives at airports in San Diego County, including SDIA. The identified alternatives included the potential

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[15] San Diego Association of Governments, *San Diego Forward: The Regional Plan | 2015-2050*, October 9, 2015. Available: http://www.sdforward.com/.

[16] San Diego County Regional Airport Authority, *Regional Aviation Strategic Plan*, Prepared by Jacobs Consultancy, March 2011. Available: http://www.san.org/Airport-Projects/Regional-Aviation-Strategic-Plan#134188-technical-report.

[17] San Diego Associated of Governments, *Final San Diego Airport Multimodal Accessibility Plan*, Prepared by CH2MHIll and HNTB, March 2012. Available: http://www.sandag.org/uploads/publicationid/publicationid_1644_14238.pdf.

advanced planning for an Airport Intermodal Transit Center (ITC) at the northside of SDIA, which has connections that include trolley, commuter rail, and local and regional buses; long-term planning analysis identified other potential connections that may include a high-speed rail station, direct connector ramps from I-5, and a people mover that could replace the existing shuttle bus connection between the northside and southside of the Airport. The AMAP is envisioned as ultimately leading to passenger access and processing on the northside of the Airport.

3.2.6 SDIA AIRPORT MASTER PLAN

The 2008 Airport Master Plan (AMP) documents the airport facilities and airfield planning process for SDIA; provides guidance for development of the Airport to meet continued passenger, cargo, and operations growth at SDIA; and specifies and approves actions to be accomplished for phased development of the Airport.

During the planning process, the following eight goals were developed to address the constraints and opportunities present at SDIA:

- Improve Levels of Service (LOS) for Airport customers and users
- Improve safety and security for Airport customers and users
- Utilize property and facilities efficiently
  - Maintain balance of passenger volumes and operations among the Airport's facilities
  - Improve tenant facilities
- Enhance Airport access as part of the region's transportation system
- Enhance regional economy by accommodating demand for air service
- Prepare measured, incremental improvements that are cost effective and respond to the region's passenger and cargo air service forecast
- Involve stakeholder and community input
- Ensure compatibility with surrounding land uses and SDRCAA policies

Overall objectives and detailed objectives to address specific issues were then developed to provide guidelines for carrying out the planning process and meeting the eight goals identified above. The overall objectives are to provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing Airport access and develop facilities that utilize Airport property and facilities efficiently and are compatible with surrounding land uses. The detailed objectives are organized into six categories; two of which, Environmental and Financial, pertain to all phases of the master-planning process, while the remaining four categories (Airfield, Terminal, Ground Transportation, and Airport Support), pertain to providing a framework for developing improved airport facilities.

3.2.7 SDIA AIRPORT LAND USE PLAN

An Airport Land Use Plan was adopted in conjunction with the Airport Master Plan, described above. The Airport Land Use Plan is a program level planning guide that depicts the boundaries of SDIA and designates locations for the four general land use categories: Airfield, Terminal, Ground Transportation, and Airport Support. The Airport Land Use Plan guides and groups similar uses to ensure compatible, shared, and orderly development of airport facilities. It may be modified or amended to respond to changes in the demand for airport facilities as identified in future passenger, operations, and cargo forecasts.

3.2.8 SDIA AIRPORT LAND USE COMPATIBILITY PLAN

One of SDCRAA's responsibilities is to act as the Airport Land Use Commission (ALUC), per California Public Utilities Code (CPUC), which requires the ALUC to prepare and adopt an Airport Land Use Compatibility Plan (ALUCP). The ALUCP for SDIA[18] was adopted in May of 2014 and is consistent with the ALP as required by state law (CPUC §21675(a)), which requires that an ALUCP be based upon a long-range airport master plan or airport layout plan. The purpose of the ALUCP is to promote compatibility between the Airport and future land use of the Airport Influence Area (AIA) for the orderly development of the Airport and environs and to protect public health, safety, and welfare in the surrounding area. The ALUCP provides airport land use compatibility policies and standards related to noise, safety, airspace protection and overflight, to guide future development and redevelopment in the AIA.

The ALUC is required by California law to review proposed airport plans for consistency with the applicable ALUCP. This requirement ensures that the ALUC is informed of changes in airport plans so that appropriate amendments to the ALUCP can be made. Airport projects that the ALUC are obligated to review include airport master plans and amendments to an airport master plan or airport layout plan that would modify previously adopted airport plans.

3.2.9 CITY OF SAN DIEGO GENERAL PLAN

The City of San Diego General Plan, comprehensively updated in 2008 and subsequently amended in 2010, 2012, 2015, and 2018, 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. The General Plan is composed of a Strategic Framework and ten major elements including Land Use and Community Planning, Mobility, Urban Design, Economic Prosperity, Public Facilities, Service and Safety, Recreation, Conservation, Noise, Historic Preservation, and Housing.

SDIA is not within the General Plan planning area; however, the General Plan includes goals specific to airport-land use planning for 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 AIAs for each area by minimizing the public's exposure to high levels of noise and risk of aircraft accidents, and address protection of public-use airports and military air installations from the encroachment of new incompatible land uses within an AIA that could unduly constrain airport operations.

3.2.10 CITY OF SAN DIEGO COMMUNITY PLANS

To assist in implementing the General Plan's City of Villages strategy and General Plan policies at the community level, the City has divided land within its jurisdiction into over 50 Community Planning Areas (CPA). Community Plans are developed for each CPA, allowing for refinement of the citywide goals and policies to address issues specific to each community. The Community Plans are components of the General Plan and typically include the elements such as Land Use, Transportation, Urban Design, Public Facilities and Services, Natural and Cultural Resources, and Economic Development.

Land use planning for SDIA is not regulated by the City of San Diego Community Plans; however, the Airport is depicted within adjoining Community Plans. The majority of SDIA property, as well as Harbor Island to the south, is

[18] Airport Land Use Commission San Diego County Regional Airport Authority, *San Diego International Airport - Airport Land Use Compatibility Plan*, Adopted April 3, 2014, Amended May 1, 2014. Available: https://www.san.org/Airport-Projects/Land-Use-Compatibility#118076-alucps.

identified by the City as "Reserve" (i.e., not located within a designated CPA). The Midway-Pacific Highway Community Plan[19] 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[20] 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). Several public viewsheds designated within the CPA look across the Project site towards San Diego Bay. The Uptown Community Plan has specific land use policy recommendations related to SDIA that include protecting public health by evaluating effects of noise and airport pollution from airport operations, implementing attenuation measures where feasible, considering noise impacts when making land use planning decisions, and coordinating with SANDAG to provide public transit connections to SDIA from the Uptown CPA.

The Peninsula Community Plan and Local Coastal Program Land Use Plan (Peninsula Community Plan)[21] designates the core of the community as residential uses with commercial uses fronting San Diego Bay and military-related industrial uses bordering SDIA and the southern portion of the peninsula. The Peninsula Community Plan identifies reducing airport noise pollution as an overall community goal.

The San Diego Downtown Community Plan[22] has specific land use policy recommendations related to SDIA including a policy to "Minimize the risk of injury, life loss, and property damage, and mitigate noise impacts that are associated with aircraft activity, including by regulating building heights, land uses, and land use intensities."

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[19] 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. 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.

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

[21] 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.

[22] 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/.

4. ENVIRONMENTAL IMPACTS

The environmental impacts of the Additional Fuel Tanks Project at SDIA are considered in this section. Each response provided below evaluates how the proposed Project, as defined in the Project Description (Section 2), may affect existing environmental conditions of 20 environmental resource categories at the proposed Project site and in the surrounding area. The EIR will further evaluate resource categories for which construction and operation of the proposed Project could potentially result in significant impacts. The evaluation and discussion are based on the environmental checklist published in the CEQA Guidelines.[23] Environmental resource categories may be carried forward individually for threshold analysis or considered for their potential contribution to cumulative impacts. The EIR will analyze the identified potentially significant impacts and, where appropriate, identify mitigation measures and explain how such measures would reduce significant impacts.

4.1 AESTHETICS

WOULD THE PROJECT:		POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Have a substantial adverse effect on a scenic vista?	X			
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	X			
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

4.1.1 DISCUSSION – (A AND C)

SDIA is located in a fully urbanized area that is surrounded by existing commercial, industrial, military, residential, and recreational uses. The Airport is relatively flat and sits within the Point Loma peninsula on the west, the hillsides of Uptown (Middletown and Mission Hills) on the east and north, and the San Diego Bay to the south. The average elevation of SDIA is between 10 to 15 feet above mean sea level (msl). The topography at the site slopes gradually to the south and west towards San Diego Bay.

The northside of the Airport, in the vicinity of the proposed Project site, contains long-term and short-term parking facilities; air cargo facilities; the Signature Flight Support's fixed-base operation facility; the Airport Traffic Control Tower (152 feet in height), an airport rescue and fire-fighting facility, the fuel farm, and the rental car center. Immediately west of the proposed Project site lies the U.S. Marine Corps Recruit Depot, San Diego (MCRD).

[23] CEQA Guidelines, *Appendix G, Environmental Checklist Form,* as amended December 2018.

In general, existing visual resources within and adjacent to SDIA consist of natural and human-made features. Natural visual features include San Diego Bay, the Navy Boat Channel, the Pacific Ocean and distant views of the Point Loma peninsula, while human-made features include the downtown skyline. Immediately surrounding SDIA is mixed-used and residential neighborhoods to the west, military use to the north, tourist-recreational uses to the south, and industrial and airport-related uses to the east.

Several public viewsheds designated within the adjacent CPAs include SDIA; however, views of the proposed Project site are generally limited to the north, northeast, and east sides of the Airport and would include the Airport, MCRD, and adjacent industrial development. The area immediately east of the Project site, between Pacific Highway and I-5, is within the Midway-Pacific Highway CPA. The area consists primarily of light industrial and airport-related commercial uses such as long- and short-term parking and car rentals, the Port District offices, and the Washington Street and Middletown Trolley Stations. East of the Midway-Pacific Highway CPA is I-5, a major transportation corridor, which leads south to the border of Mexico and north to Los Angeles. Currently, motorists on southbound I-5 have southerly views of San Diego Bay, the Pacific Ocean, the Point Loma peninsula, and the downtown skyline. Views from I-5 are partially obstructed by freeway railings, utility lines, and by buildings and private fences near the freeway.

Given the height (58 feet) and diameter (58 feet) of the proposed fuel tanks, the proposed Project could result in a substantial adverse effect on a scenic vista or conflict with regulations governing scenic quality, such as those included in area Community Plans or the CCA. As such, potential impacts on scenic views and scenic quality will be analyzed in the Draft EIR.

4.1.2 DISCUSSION – (B)

The proposed Project site consists of highly-developed areas within and adjacent to a busy international airport. The Project site is not located adjacent to or within the viewshed of a designated state scenic highway. The nearest designated state scenic highway is approximately 2 miles east of the proposed Project site (a one-mile segment of State Route 163 along the western portion of Balboa Park).[24] The Project site is not visible from the scenic highway-eligible portion of State Route 163. Therefore, the proposed Project would not impact scenic resources within a state scenic highway.

4.1.3 DISCUSSION – (D)

Uses within and surrounding SDIA contain numerous light sources that generate varying degrees of light emissions. Primary sources of light at SDIA include light emanating from buildings (i.e., terminals, cargo, and maintenance facilities, the rental car center, etc.), safety and operational lighting (airfield lighting, parking, street lighting, wayfinding, etc.), and private vehicles, buses, and shuttles. Existing SDIA facilities produce light consistent with highly urbanized areas, which specifically provides for the safety and security of people, property, and the air transportation network located at SDIA. Certain Airport facilities are visible from the Airport's periphery and emit light at intensities beyond average ambient light conditions; however, existing lighting does not interfere with nighttime Airport operations. Existing sources of daytime glare on the Project site are associated with the reflective glass or mirror-like materials comprising the façades of facilities and structures within the Airport. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling throughout the Project site.

[24] California Department of Transportation, *California Scenic Highway Mapping System website*, updated September 7, 2011. Available: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

The proposed Project would result in the introduction of three additional fuel tanks at the existing SDIA fuel farm. Renderings of the proposed Project from nearby viewsheds will be provided in the Draft EIR. The propose fuel tanks would contribute relatively minor new additional sources of lighting typical of a modern airport transportation area, which currently contains moderate to high levels of ambient lighting. Similar to existing development at SDIA, all lighting associated with the proposed Project would be shielded and directed downward to minimize light spillover. The shielding and focusing of lighting sources would also minimize any adverse glare effects. The proposed fuel tanks would also utilize low-reflective materials to minimize any introduced sources of daytime or nighttime glare within the area. Coordination with FAA would occur during project design to ensure that new facilities do not pose any hazard to aircraft or air traffic controllers. While the proposed Project would introduce relatively minor additional sources of lighting, these introduced sources of lighting would be typical of airport facilities within the Project area.

Currently, areas to the east of the Airport in Middletown and Mission Hills that have nighttime views of San Diego Bay, the Pacific Ocean, and the Point Loma peninsula are impacted by light and glare from the current uses at the SDIA and existing uses in the surrounding urbanized area, including vehicle lights associated with I-5. While operation of the proposed fuel tanks would incrementally increase overall nighttime lighting, such lighting would be similar to existing light sources at the Airport. Based on the above, operation of the proposed Project would not alter lighting so as to create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

4.2 AGRICULTURE AND FORESTRY RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				X

4.2.1 DISCUSSION

The proposed Project site is located within and adjacent to a fully-developed airport, surrounded by airport-related uses and urbanized areas, which have been fully developed. The nearest farmland considered prime, unique, or of

statewide importance is located approximately 12.5 miles south of the Airport in Otay Valley Regional Park.[25] No agricultural resources, operations, or land under the Williamson Act are on the proposed Project site or within the surrounding areas. Additionally, no forest or timberland resources exist at or in the vicinity of the proposed Project site. Consequently, the proposed Project would have no impact on agriculture and forestry resources.

4.3 AIR QUALITY

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

4.3.1 DISCUSSION

The proposed Project would install three additional fuel tanks to extend the on-airport fuel supply capacity from approximately 2 days to 6 days during existing periods of peak aviation activity. 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. Within the Airport's existing airfield capacity, any growth in number of passengers or aircraft operations would occur regardless of on-airport fuel capacity and, in the instance the proposed Project is not constructed, airline companies would be reliant on trucked fuel deliveries to supplement on-Airport fuel shortfalls. Consequently, an increase in on-airport fuel supply would not result in any change to the number or types of aircraft operating at SDIA or increase the Airport's capacity. Additionally, the proposed Project would not result in changes to the manner in which fuel is supplied to, or distributed within, the Airport and would not result in a change in operational air pollutant emissions.

Without increasing the existing fuel storage capacity at SDIA, full or partial resupply of fuel reserves would necessarily be accomplished via tanker trucks during any interruption of fuel delivery pipeline service or fuel tank maintenance. Trucking fuel would result in a substantial number of vehicle miles traveled and increase the amount of emissions generated during tanker truck trips.

Regarding National Ambient Air Quality Standards (NAAQS), established under the Clean Air Act (CAA), the San Diego area, including SDIA, is designated as a nonattainment area for ozone (O_3). With respect to California Ambient Air Quality Standards (CAAQS), the area is designated as nonattainment for both 1 and 8-hour criteria for O_3, particulate matter (PM_{10}), and $PM_{2.5}$.[26] In accordance with the federal Clean Air Act for nonattainment and

[25] California Department of Conservation, *San Diego County Important Farmland 2016, Sheet 1 of 2 (Map)*, May 2018.

[26] California Environmental Protection Agency, Air Resources Board, *Area Designation Maps / State and National*, effective June 2013.

attainment/maintenance areas, San Diego County is included in the California State Implementation Plan (SIP) for ozone and CO.[27] SDIA emissions are also accounted for in the Regional Air Quality Strategy (RAQS).

A Memorandum of Understanding (MOU) between SDCRAA, and the Attorney General of California requires emissions reductions measures to be implemented during construction and operation of all Airport facilities.[28] Generally, air pollutant emissions associated with construction activities consist of CO, oxides of nitrogen (NO_X), PM_{10}, $PM_{2.5}$, lead, sulfur dioxide (SO_2), and volatile organic compounds (VOC). Due to the limited scope of the Project, brief construction schedule, and required implementation of emission reduction measures, emissions related to construction and operations of the Additional Fuel Tanks Project would not exceed state or federal thresholds of significance or contribute to an existing air quality violation.

Construction-related emissions for the proposed Project were modeled using the California Emissions Estimator Model (CalEEMod) to determine whether emissions associated with construction activities would exceed screening-level thresholds specified for projects located within the San Diego Air Pollution Control District (see **Table 4-1** and **Attachment 1** for greater detail). Based on the CalEEMod results, overall construction emissions would not exceed state or federal standards or conflict with the San Diego County SIP or RAQS and, therefore, would result in a less than significant impact on air quality.

TABLE 4-1 ANNUAL EMISSIONS OF CRITERIA POLLUTANTS DUE TO CONSTRUCTION OF THE PROPOSED PROJECT

CONSTRUCTION YEAR	CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$
Annual Emissions (Tons/Year)						
2020	0.362	0.048	0.586	0.001	0.051	0.033
2021	0.924	0.688	1.09	0.002	0.079	0.060
Federal *de minimis* Threshold	100	100	100	100	100	100
California Tons per Year Threshold	100	13.7	40	40	15	10
Significant?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Daily Emissions (Pounds/Day)						
2020	9.168	1.149	14.038	0.027	1.751	1.060
2021	8.017	55.332	9.705	0.015	0.670	0.532
California Pounds per Day Threshold	550	75	250	250	100	55
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTES:
CO—Carbon Monoxide
NO_X—Oxides of Nitrogen
PM_{10}—Particulate Matter less than ten microns in diameter
$PM_{2.5}$—Particulate Matter less than 2.5 microns in diameter
SO_X—Sulfur Oxides
VOC—Volatile Organic Compounds
SOURCE: Ricondo & Associates, Inc., January 2019, using the California Emissions Estimator Model.

[27] California Air Resources Board, San Diego County Air Quality Management Plans Website Available: https://www.arb.ca.gov/planning/sip/planarea/sansip.htm, December 16, 2018.

[28] State of California and San Diego County Regional Airport Authority, *Memorandum of Understanding Between the Attorney General of the State of California and the San Diego County Regional Airport Authority Regarding the San Diego International Airport Master Plan*, May 5, 2008.

Operation of the proposed fuel tanks would not result in a significant increase in air pollutant emissions. The proposed fuel tanks would be integrated with the existing fuel farm mechanical conveyance systems. The conveyance systems include active mechanical equipment employed during transfer of fuel between tanks and throughout the Airport's distribution system. No changes to the existing fuel farm distribution system or the larger regional fuel supply distribution system are proposed as part of the Additional Fuel Tanks Project. Due to the nominal increase in air pollutant emissions that would result from operation of the proposed fuel tanks, the operational air pollutant emissions associated with the proposed Project were not calculated.

Several potentially sensitive receptors and exposed populations were identified in the 2018 Draft Airport Development Plan (ADP) EIR.[29] However, implementation of the proposed Project would not expose sensitive receptors (including, but not limited to, schools, hospitals, resident care facilities, or day-care centers) to substantial air pollutant concentrations as the proposed Project site is entirely on Airport property and would be consistent with existing Airport operations. Resupply of the proposed fuel tanks would be completed via an existing underground fuel delivery pipeline system. Additionally, transference of fuel from the fuel farm to most aircraft is currently completed through the use of fuel trucks. Fuel transference would be conducted in accordance with FAA Advisory Circular 150/5230-4B[30] and NFPA 407, Standard for Aircraft Fuel Servicing, to ensure safe and efficient transfer of fuel. Additionally, operation of the fuel farm would be conducted in accordance with all applicable federal, state, and local regulations, consistent with operation of the existing fuel farm. Sensitive receptors would not be substantially exposed to emissions as a result of the proposed Project.

The use of diesel equipment during construction would generate near-field odors. Diesel equipment emits a distinctive odor that may be considered offensive to certain individuals. The closest sensitive receptors to the Project site are MCRD barracks and a multi-family residential building on Hancock Street located approximately 1,100 feet and 2,200 feet north/northeast of the proposed Project site, respectively. Due to the temporary nature of construction activities, combined with variabilities in wind speed and direction as related to the dispersion of construction emissions and distances to nearby receptors, odors from construction-related diesel exhaust would not affect a substantial number of people. The Project site is located at SDIA, which is characterized by airport operations, including aircraft movement, passenger transport and processing, and maintenance activities. The proposed Project would result in the continuation of airport operations consistent with existing aircraft activity, passenger transport or processing, and maintenance activities at SDIA and would not notably change existing odors at or in the vicinity of the Project site. Therefore, operation of the proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

[29] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.2 – Air Quality,* July 2018.

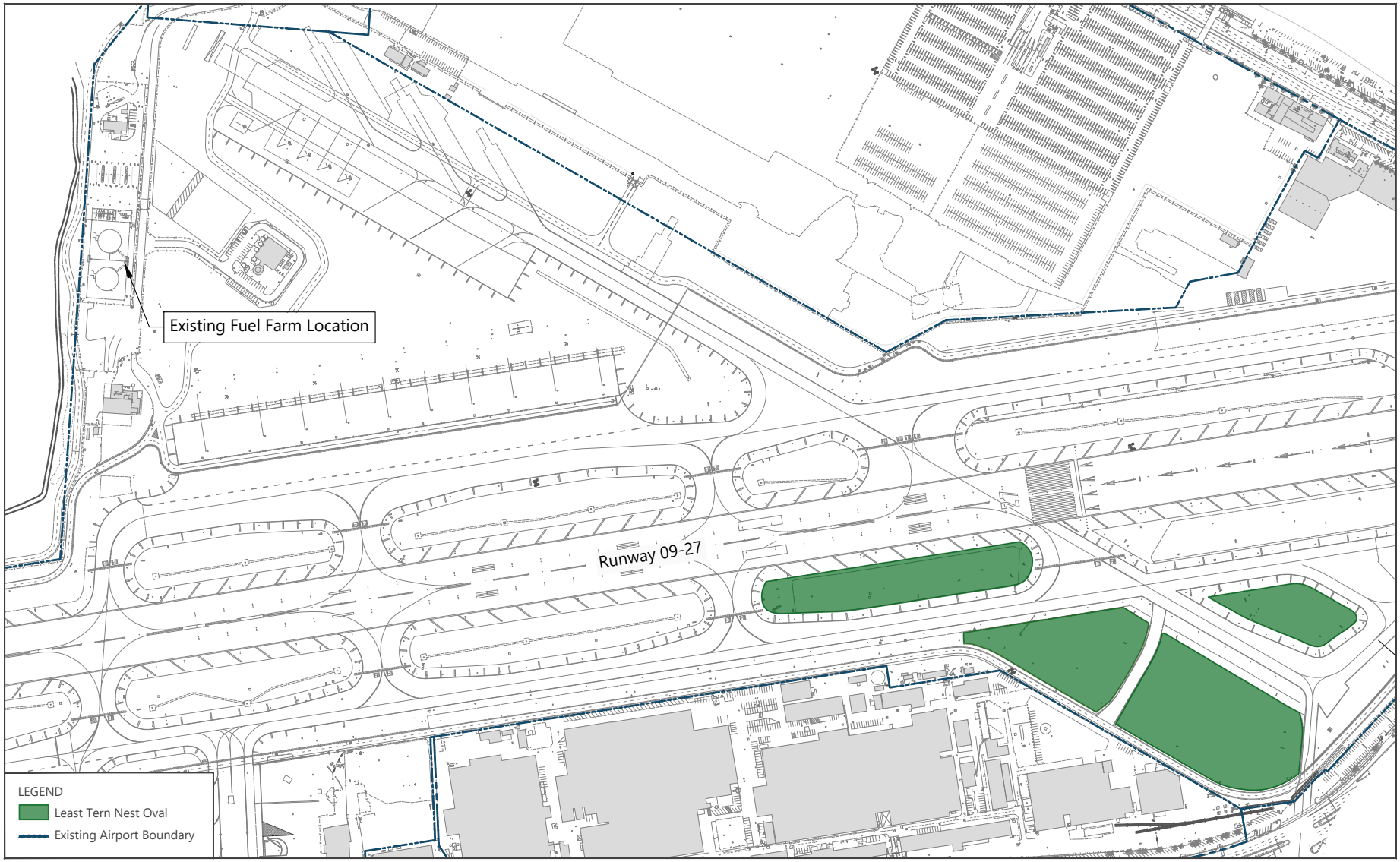
[30] U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular 150/5230-4B, Aircraft Fuel Storage, Handling, Training, and Dispensing on Airports*, September 28, 2012, updated June 25, 2017.

4.4 BIOLOGICAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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 California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
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 California Department of Fish and Game or U.S. Fish and Wildlife Service?	X			
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?				X
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?	X			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

4.4.1 DISCUSSION – (A)

The SDIA Additional Fuel Tanks Project is located entirely on Airport property in an urbanized area. The proposed Project site does not support habitats for sensitive or special status species, nor sensitive natural habitat, including wetlands. Portions of the SDIA airfield are seasonally inhabited by the California least tern (*Sterna antillarum browni*), a federal- and state-listed endangered species (see **Exhibit 4-1**). 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. The least tern nests colonially on undisturbed, sparsely vegetated, flat areas with loose, sandy substrate adjacent to open water foraging areas. California least terns have nested at multiple locations at SDIA with the first observations of terns thought to be nesting at SDIA occurring in 1969. Nesting locations around the Airport include Oval 3 South, the area used most consistently, which is approximately 2,300 feet to the southeast of the proposed Project site. Due to the distance between the proposed Project site and the nesting locations, the proposed Project would not directly impact the California least tern or modify the California least tern habitat located on the SDIA airfield.



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

EXHIBIT 4-1

CALIFORNIA LEAST TERN NESTING LOCATIONS

NORTH 0 500 ft.

Drawing: P:\Project-Chicago\San Diego\SAN Fuel Farm\05-Drawings&Models\SAN Fuel Tank Project_20190319.dwgLayout: 4-1 Plotted: Apr 18, 2019, 12:43PM

4.4.2 DISCUSSION – (B AND D)

Projects occurring at SDIA California near least tern nesting ovals necessitate least tern management requirements; a Biological Opinion (BO), prepared by the U.S. Fish and Wildlife Service (USFWS) in 1993, identified reasonable and prudent measures as well as terms and conditions of construction and operation required to protect terns at SDIA.[31] SDCRAA continues to work cooperatively with the USFWS, Port District, and the U.S. Navy to protect the California least tern in the San Diego region. SDCRAA has created a program to protect the California least terns at SDIA, which includes the measures specified in the 1993 BO and in the 2013 Informal Section 7 Consultation between the FAA and USFWS regarding potential effects of the SDIA Northside Improvements Project.[32] These measures are also consistent with Chapter 3, Article 5 – Land Resources, of the CCA intended to protect environmentally sensitive habitat areas.

Although the distance between the proposed Project site and known California least tern nesting areas is approximately 2,300 linear feet and adherence to the measures identified in the BO would be required, construction and operation of the proposed Project have the potential to indirectly adversely impact California least tern at SDIA and this potential impact will be further examined in the Draft EIR.

4.4.3 DISCUSSION – (C)

SDIA is highly developed (e.g., buildings, paved surfaces, ornamental landscaping). There are no wetlands on or near the proposed Project site.[33]

4.4.4 DISCUSSION – (E)

The proposed Project site is located entirely on previously developed Airport property. Construction of the proposed Project would not result in the loss of any trees, or other sensitive vegetation, nor would the proposed Project conflict with any local policies or ordinances protecting biological resources.

4.4.5 DISCUSSION – (F)

SDIA is not located within an adopted habitat conservation plan or natural community conservation plan, and there would be no impacts as a result of construction or operation of the proposed Project.

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

[32] U.S. Department of the Interior, Fish and Wildlife Service, *Letter from Karen Goebel, Assistant Field Supervisor to Victor Globa, Federal Aviation Administration, Subject: Informal Section 7 Consultation for San Diego International Airport Northside Improvements Project, San Diego County, California*, August 20, 2013.

[33] FN Wood Environment & Infrastructure Solutions, Inc., *Subject: Result of the Wetlands Assessment Survey at the San Diego International Airport, San Diego, California,* August 15, 2019.

4.5 CULTURAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				X
c) Disturb any human remains, including those interred outside of dedicated cemeteries?				X

4.5.1 DISCUSSION

The construction of the proposed Project would occur entirely on previously developed Airport property. Additionally, a review of the Draft EIR for the SDIA Airport Development Plan (ADP),[34] and associated background records, revealed no historical resources or known archaeological resources within or near the proposed Project site. SDIA is constructed on fill material and it is unlikely that previously undiscovered archaeological resources or human remains would be exposed during ground-disturbing construction activities or during operation of the proposed fuel farm improvements. However, a cultural monitor representing the Viejas Band of the Kumeyaay Indians would be present during excavation activities associated with the proposed Project. Due to the limited scope of the proposed Project and absence of cultural resources on or in proximity of the Project site, no impact to cultural resources from the proposed Project would occur.

4.6 ENERGY

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

4.6.1 DISCUSSION

Construction of the proposed Project would consume energy in the form of electricity, natural gas, and transportation-related fuels, through use of construction equipment, transport of construction materials, temporary lighting, etc. Fuels associated with construction are widely available. The proposed Project would require additional energy at the Project site for lighting and operational systems associated with the proposed improvements, including transference of fuel within the fuel farm tank system; however, on-going energy requirements of the fuel farm would be similar to existing energy use at the fuel farm. Additional energy may be required to operate off-site

[34] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.6 – Cultural Resources,* July 2018.

fuel delivery pipeline pumps during lengthier periods of fuel transmission; however, the additional energy would be nominal and no new fuel delivery pipeline pumps, either on-site or along the existing fuel delivery pipeline alignment, are proposed as a part of the Project. As such, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation.

The capacity of the existing fuel farm accommodates approximately 2 days of aviation fuel requirements during peak periods. As described in Section 4.3.1, in the event the fuel delivery pipeline supporting the fuel tanks were to be compromised or the resupply service interrupted, replenishment of on-airport fuel would necessarily be completed via tanker trucks. Trucked fuel delivery would result in an increase in truck miles traveled and an associated increase in fuel use.

In 2008, SDCRAA and the Attorney General of California entered into an MOU and adopted the SDCRAA Sustainability Plan to control GHG emissions and increase sustainability at SDIA.[35] As part of this goal, specific renewable energy objectives were established. Based on the limited energy requirements from the proposed Project, the implementation of the proposed Project would not conflict with or obstruct any applicable renewable energy or energy efficiency plans.

4.7 GEOLOGY/SOILS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (ii) Strong seismic ground shaking? (iii) Seismic-related ground failure, including liquefaction? (iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

[35] State of California and San Diego County Regional Airport Authority, *Memorandum of Understanding Between the Attorney General of the State of California and the San Diego County Regional Airport Authority Regarding the San Diego International Airport Master Plan*, May 5, 2008.

4.7.1 DISCUSSION

SDIA is built on fill material, comprising mainly sand, silt, and clay material placed into San Diego Bay in the late 1920s and early 1930s. There are several active fault areas in Southern California due to its proximity to the local convergence of North American and Pacific Tectonic Plates. The most prevalent zone of faults in San Diego is the Rose Canyon Fault Zone, within which SDIA is located.

A review of the Draft EIR for the San Diego International Airport ADP[36] 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 Blight Fault Zone, extends from the San Diego Bay to a terminus approximately 2,700 feet south of the proposed Project site.[37] The nearby active Spanish Blight 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.[38] 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.[39] The No-Build Zone study area identified in the ADP Draft EIR is approximately 1,600 feet south of the proposed Project site.

The proposed Project does not include facilities that would be occupied or accessible to the general public. Additionally, all construction would comply with the California Building Code and City of San Diego Building Code and would include seismic stability ground improvements, specifically compaction grouting, to solidify soils and support structures. The depth and layout of ground improvements would be determined during detailed design. Due to the distance of the proposed Project to areas of instability, the limited number of permanent personnel required for operation of the fuel farm, and seismic stability measures that would be implemented into the project design, impacts to people or structures resulting from strong seismic ground shaking, seismic-related ground failure (including liquefaction) would be less than significant.

The proposed Project site and surrounding areas are relatively flat, primarily surrounded by existing Airport and urban development. Construction and operations of facilities associated with the SDIA Additional Fuel Tanks Project would not result in the exposure of people or structures to the risk of landslides during a seismic event.

The construction of the proposed Project would result in minor grading, excavation and fill. Based on the relatively flat topography, the previous development of the proposed Project site, and required implementation of best

[36] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.8 – Geology and Soils,* July 2018.

[37] 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.

[38] 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.

[39] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.8 – Geology and Soils,* July 2018.

management practices (BMPs) included in the Airport's Storm Water Management Plan,[40] impacts related to soil erosion would be less than significant.

The Draft EIR for the San Diego International Airport ADP,[41] noted that the SDIA contains soils that may be potentially susceptible to instability and expansion. However, based on the previous development of the proposed Project site, application of ground improvements, and compliance with applicable building code provisions and regulatory/industry standards, impacts related to instability and expansive soils would be less than significant.

The Project site is located in an urbanized area where wastewater infrastructure is currently in place. Facilities associated with the SDIA Additional Fuel Tanks Project would not use septic tanks or alternative wastewater disposal systems. Consequently, the ability of on-site soils to support septic tanks or alternative wastewater systems would not be relevant to the proposed Project.

Finally, a review of the Draft EIR for the San Diego International Airport ADP[42] revealed no record or evidence of unique paleontological or geological resources being located at or near the proposed Project site and no impacts to these resources are anticipated.

4.8 GREENHOUSE GAS EMISSIONS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

4.8.1 DISCUSSION

The proposed Project would install three additional fuel tanks to extend the on-airport fuel supply from approximately 2 days to 6 days during current periods of peak aviation operations. An increase in on-airport fuel supply would not result in any change to the number or types of aircraft operating at SDIA; rather, the increase would provide sufficient fuel to maintain aircraft operations in case of interruption of fuel delivery pipelines supplying fuel to the fuel farm or in the event individual fuel tanks are temporarily taken offline due to maintenance or an emergency. Construction of the proposed Project would generate greenhouse gas (GHG) emissions; however, State CEQA Guidelines do not set a numerical threshold of significance for GHG emissions with which GHG emissions for the proposed Project can be compared. Accordingly, per Section 15064.4 of the State CEQA Guidelines, SDCRAA

[40] San Diego County Regional Airport Authority, *SAN Storm Water Management Plan - June 2015*, Prepared by Amec Foster Wheeler, 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.

[41] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.8 – Geology and Soils,* July 2018.

[42] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.6 – Cultural Resources,* July 2018.

has considered the extent to which the proposed Project may increase or reduce GHG emissions in contrast with the existing GHG baseline to assess the significance of GHG emissions resulting from the proposed Project. **Table 4-2** provides baseline emissions data for SDIA against which GHG emissions resulting from the proposed Project are assessed for impact significance.

TABLE 4-2 SDIA EXISTING (2018 BASELINE) CONDITIONS GREENHOUSE GAS EMISSIONS INVENTORY

SOURCE	MT CO_2e	PERCENT OF TOTAL
Aircraft	249,504	74
Auxiliary Power Units	2,223	2
Ground Support Equipment	12,091	4
Stationary Sources	12,940	4
Motor Vehicles	55,434	16
Other	5,597	2
Total	**337,789**	**100**

NOTES:
MT CO_2e—metric tons of CO_2 equivalent
SOURCE: San Diego County Regional Airport Authority, Draft Revised Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.3 – Greenhouse Gases and Climate Change, September 2019.

The CalEEMod analysis of the proposed Project determined construction of the proposed Project would generate GHG emissions as a result of construction vehicle traffic and the operation of construction equipment (see **Table 4-3**). Operation of the proposed Project would nominally increase GHG emissions over the minimal amount generated by the existing fuel farm.

TABLE 4-3 PROPOSED PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS

YEAR	MT CO_2e
2020	96
2021	150
Total	**246**

NOTE:
MT CO_2e—metric tons of CO_2 equivalent
SOURCE: Ricondo & Associates, Inc., January 2019

Construction and operation of the proposed Project would comply with the SDCRAA Air Quality Management Plan, which includes requirements of Assembly Bill 32. Assembly Bill 32, the California Global Warming Solutions Act, requirements are applicable to Airport projects that would generate 1 megawatt or more of electricity, result in 2,500 tons of carbon dioxide equivalents (CO_2e), or emit more than 25,000 tons of CO_2e per year as a stationary source.[43] The proposed Project would not produce electricity, nor would construction of the proposed Project exceed 2,500 tons of CO_2e. Emissions from operation of the proposed Project would be limited and would not produce more than 25,000 tons of CO_2e. As a part of the SDCRAA Sustainability Policy protocol, SDCRAA is a

[43] San Diego County Regional Airport Authority, *Air Quality Management Plan – Final Draft*, November 2009.

member of Airports Council International North America's Global Reporting Initiative, which requires airport sponsors to report emissions.

SDIA, through an MOU between SDCRAA and the Attorney General of California, has also specified pollution reduction measures to control GHG emissions at SDIA. The goal of the measures identified in the MOU are to reduce fugitive dust and exhaust emissions related to construction, as well as transportation- and operations-related emissions through trip reduction, clean vehicle fleets, and energy conservation. Construction of the proposed Project would only slightly contribute to global climate change, accounting for less than one-hundredth of a percent of U.S. GHG emissions, and less than two-tenths of a percent of SDIA's non-aircraft operations GHG emissions. To ensure that GHG emissions associated with construction are minimized to the extent possible, SDCRAA would continue to implement emission reduction measures as described above. Furthermore, if additional fuel storage capacity is not constructed at the Airport, fuel would have to be transported via tanker trucks to supplement any fuel shortage or to provide on-going fuel resupply if the existing fuel delivery pipeline were to cease. Resupply of SDIA fuel supplies conducted via tanker trucks would require substantial vehicle miles to be traveled and result in an increase in air pollution and GHG emissions from tanker fleets.

The proposed fuel tanks would be constructed on the existing fuel farm. Operation of the proposed fuel tanks would be consistent with current fuel farm operations and would nominally increase GHG emissions at SDIA. Application of the pollution reduction measures during construction of the proposed Project and the limited emissions emitted during construction and operation of the proposed Project would result in less than significant generation of GHG emissions. The proposed Project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the direct and indirect impact of GHG emissions attributed to the proposed Project would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			
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?	X			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X			
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?	X			

f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X	
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?		X

4.9.1 DISCUSSION – (A, B, AND D)

The proposed Additional Fuel Tanks Project would increase the amount of fuel storage during routine operation of the Airport, which would increase the chances of a spill or release of substances that could result in contamination of soil or groundwater. However, the handling and storage of hazardous substances are stringently regulated, as is the release of hazardous materials, including emergency response and clean up requirements. Four primary laws have been passed governing the handling and disposal of hazardous materials, chemicals, substances, and wastes, which are mostly promulgated by the US Environmental Protection Agency (USEPA). The two statutes most applicable to airport projects 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 governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA regulates cleanup of any release of a hazardous substance (excluding petroleum) in the environment. Besides RCRA and CERCLA, hazardous materials are also regulated by the Clean Air Act (CAA), Clean Water Act (CWA), the Safe Drinking Water Act (SDWA), Hazardous Materials Transportation Act (HMTA), and the Emergency Planning & Community Right to Know Act (EPCRA). Together, these regulations serve as guiding principles governing the storage, use, and transportation of hazardous and other regulated materials from their time of origin to their ultimate disposal. The recovery and clean-up of environmental contamination resulting from the accidental or unlawful release of these materials and substances are also governed by these regulations.

On the state level, the agency with similar authority to the USEPA over hazardous materials is the California Environmental Protection Agency (Cal-EPA). Specifically, the Cal-EPA Department of Toxic Substances Control (DTSC) is responsible statewide for matters concerning the use, storage, transport and disposal of hazardous materials. Similarly, the California Integrated Waste Management Board (CIWMB) is responsible for the management of solid wastes and the Cal-EPA Office of Environmental Health Hazard Assessment (OEHHA) is involved in the evaluation of risks to public health and the environment posed by hazardous materials and environmental contamination. Importantly, Cal-EPA delegates much of the enforcement responsibility for hazardous materials to local governments under the Certified Unified Program Agency (CUPA) program.

Locally, the San Diego County Department of Environmental Health (DEH) Hazardous Materials Division (HMD) serves as the CUPA and is responsible for regulating hazardous materials, hazardous wastes, and underground storage tanks (USTs). The DEH is also designated as the Local Enforcement Agency (LEA) by the CIWMB and is responsible for enforcing regulations pertaining to solid waste disposal units (i.e., landfills, old burn dumps, etc.). The San Diego Regional Water Quality Control Board (the Water Board) also has jurisdiction over the management of potential sources of surface and groundwater contamination such as the cleanup of UST and aboveground storage tank (AST) spill sites. Finally, the San Diego Air Pollution Control District (SDAPCD) is involved in the assessment of health and environmental hazards associated with toxic (or hazardous) air pollutants.

The CAL FIRE-Office of the State Fire Marshal (OSFM) is responsible for ensuring the implementation of the Aboveground Petroleum Storage Act (APSA) program element of the Unified Program. Facilities with total petroleum storage quantities at or above 10,000 gallons are inspected at least once every three years by a Unified Program Agency and have reporting and fee requirements. All regulated facilities must meet the federal Spill,

Prevention, Control and Countermeasure (SPCC) Plan requirements.[44] SDIA maintains a SPCC plan to comply with the APSA.

Operations at SDIA are subject to National Pollutant Discharge Elimination System (NPDES) Permits Nos. CA000001 and CAS0109266, a statewide General Permit to Discharge Storm Water Associated with Industrial Activity. Covered activities include, among others, 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 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. Additionally, the Airport Authority and many of the tenants at SDIA have established Hazardous Materials Release Response Plans in compliance with the Hazardous Materials Release Response Plans and Inventory Law of 1985. The plans include inventories of hazardous materials 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 proposed Project would include components that may increase the potential of hazards to the public or environment. The proposed Project would be constructed adjacent to the existing fuel farm and include the construction of additional containment dike walls. Construction of additional secondary and intermediate containment dike walls, and modification of one of the existing containment dike walls, would expand the existing containment dike area to meet containment requirements for the larger proposed tanks (see Exhibit 2-2). The existing fire suppression system would be enhanced to include new foam makers and updated equipment.

Implementation of the proposed safety elements would reduce the potential for creation of a significant hazard to the public or the environment; 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 through the routine transport, use, or disposal of hazardous materials.

Government Code Section 65962.5 requires that the California Department of Toxic Substances Control (DTSC) compile and maintain a list of all hazardous substance release sites pursuant to Section 25356 of the Health and Safety Code. DTSC's list of sites that meet the criteria of HSC § 25356 has been compiled into a "Cortese" list. A review of this list has determined that the Project site is located in the vicinity of several DTSC hazardous materials sites including the San Diego Municipal Airport site, the CAMP CONSAIR site, and the Consolidate Aircraft Main site.[45] The potential for the SDIA Additional Fuel Tanks Project to interfere with ongoing remediation activities at on-airport sites will be examined in the Draft EIR.

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 encounter or generate hazardous or solid wastes and debris and may result in the exposure of the public and/or the environment to hazardous materials.

As such, the potential hazards and hazardous substance impacts will be analyzed in the Draft EIR.

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[44] California Office of the State Fire Marshall, Certified Unified Program Agency, *Aboveground Petroleum Storage Act*. Available: http://osfm.fire.ca.gov/cupa/apsa.

[45] California Department of Toxic Substances Control, *Envirostor*. Available: www.envirostor.dtsc.ca.gov/public/. Accessed December 12, 2018.

4.9.2 DISCUSSION – (C)

The proposed Project would not be located within a quarter-mile of an existing or proposed school; therefore, no impacts related to the emitting of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would occur with the implementation of the proposed Project.

4.9.3 DISCUSSION – (E)

The SDIA Additional Fuel Tanks Project is located entirely on SDIA property. Numerous safeguards are required by law to minimize the potential for and the effects from an accident if one were to occur. FAA's airport design standards establish, among other things, land use related guidelines to protect people and property on the ground, including establishment of safety zones that keep areas near runways free of objects that could interfere with aviation activities.

The SDIA ALUCP provides guidance on land use compatibility policy and standards with regard to noise and safety for communities within the AIA. Although the ALUC has no authority over Airport development, communities within the AIA must consider the ALUCP in their respective land use planning documents and zoning practices. Accordingly, San Diego Municipal Code, Article 2, Division 2 establishes the Airport Approach Overlay zone to regulate building height limits and land uses within the Hazard Area established by the San Diego Municipal Code to protect aircraft approaching and departing from SDIA from obstacles.[46] In addition to the many safeguards required by law, the Airport Authority and tenants of SDIA maintain Emergency Response and Evacuation Plans that also serve to minimize the potential for and the effects of an accident.

The facilities associated with the SDIA Additional Fuel Tanks Project would meet all applicable safety-related design standards and comply with San Diego Municipal Code, Article 2, Division 2. However, the proposed Additional Fuel Tanks Project would increase the amount of fuel storage during routine operation of the Airport. 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 through the routine transport, use, or disposal of hazardous materials. The proposed Project would increase the potential for a spill or release of substances that could result in a safety hazard for people residing or working in the Project area. Therefore, the proposed SDIA Additional Fuel Tanks Project could potentially result in a significant safety impact to people working on or in proximity to the proposed Project area and will be analyzed in the Draft EIR.

4.9.4 DISCUSSION – (F)

SDIA staff and tenants maintain emergency response and evacuation plans to minimize the potential for, and the effects of, an accident or emergency should the need arise. These response plans would remain in place during construction and operation of the proposed Project. Further, construction activities would comply with SDIA and FAA guidelines and procedures to limit the impacts of construction at the Airport, including the potential to affect emergency response. Adequate ingress and egress to the Airport, including emergency vehicle access, would be maintained during construction for both construction workers, passengers, and other Airport personnel.

Construction activities would occur within the boundaries of SDIA. During construction, access routes in and out of

[46] San Diego Municipal Code, *Article 2: Overlay Zones, Division 2: Airport Approach Overlay Zone*, effective January 1, 2000. Available: http://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art02Division02.pdf.

SDIA would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Fire Code regulations.[47,48] In addition, SDIA would submit a Notice of Proposed Construction or Alteration to FAA (Form FAA 7460-1), in advance of construction, as required by 14 Code of Federal Regulations (CFR) Section 77.9.

North Harbor Drive adjacent to SDIA, Laurel Street, and I-5 are identified tsunami evacuation routes on the County of San Diego Tsunami Evacuation Map for the City of San Diego.[49] As described above, adequate vehicular access would be provided and maintained during construction. This includes access from surrounding properties to the tsunami evacuation routes. Further, adequate egress from the construction site must be provided pursuant to the California Fire Code. Egress from the Project site during construction would include routes that would allow construction workers and airport personnel to reach North Harbor Drive, Laurel Street, and I-5. Therefore, the proposed Project would not conflict with the City's evacuation routes during construction.

The proposed Additional Fuel Tanks Project would be designed to adequately allow access for emergency responders and egress for visitors and employees to and from the SDIA fuel farm. Compliance with emergency access requirements would ensure the proposed Project would not interfere with an existing emergency response or emergency evacuation plan. Components of the proposed Project would include dike containment measures and safety equipment to aid employees and responders in the event of an emergency.

As such, impacts related to emergency access and response plans would be less than significant with the development of Emergency Response Evacuation Plans, in accordance with FAA, State Fire Marshal, and San Diego Fire Code regulations.

4.9.5 DISCUSSION – (G)

Because there are no potential sources of wildland fires within the proposed Project site vicinity, no impacts related to wildland fires would occur.

[47] Code of Federal Regulations, Title 14, Part 139, Sections 139.315–139.319—*Air Rescue and Firefighting (ARFF)*, January 1, 2011.

[48] 24 California Code of Regulations, Part 9 – California Fire Code, *Chapter 9 (Fire Protection Systems) and Chapter 10 (Means of Egress)*, effective January 1, 2017.

[49] County of San Diego, *Tsunami Evacuation Map – City of San Diego*, undated. Available: http://www.readysandiego.org/tsunami/Map_SD_SanDiegoCityFINALv3.pdf.

4.10 HYDROLOGY/WATER QUALITY

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that would:			X	
(i) Result in substantial erosion or siltation on- or off-site;			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
(iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

4.10.1 DISCUSSION

The proposed SDIA Additional Fuel Tanks Project would include the construction of three additional fuel tanks, located entirely on Airport property. The proposed Project site is currently comprised of asphalt, concrete, exposed soil, and limited low, sparse brush and grass. Clearing of this site would result in a slight increase in impervious surface area. However, the increase in impervious surface area would be relatively small and the Project would adhere to applicable stormwater management policies and procedures noted in the SDIA Storm Water Management Plan,[50] issued under the San Diego Regional Water Quality Control Board (Water Board) through NPDES Permit No. CAS0109266 and Permit No. CAS000001. A Storm Water Pollution Prevention Plan (SWPPP) would be developed for the proposed Project to address construction-related surface water quality impacts and delineate water quality control measures to address those impacts. Operation of the proposed Project would not produce any discharges

[50] San Diego County Regional Airport Authority, *SAN Storm Water Management Plan - June 2015*, Prepared by Amec Foster Wheeler, 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.

that require new discharge requirement permits or modification of existing permits. Additionally, the proposed Project would not violate existing water quality standards. As such, impacts would be less than significant.

Construction and operation of facilities associated with the proposed Project would not require the use of groundwater and, thus, would not deplete groundwater supplies. The Airport is constructed entirely on fill material and groundwater underlying SDIA is not used for drinking, irrigation, or industrial purposes, nor does it contribute to beneficial uses of the San Diego Bay coastal waters.[51] The amount of unpaved land converted to impervious surfaces as a result of the proposed Project is relatively small, thus, impacts to groundwater would be less than significant.

The proposed Project would require the relocation or alteration of existing storm drain infrastructure, which may result in a nominal change in existing drainage patterns at the proposed Project site. Modification of drainage infrastructure associated with the proposed Project, however, would be integrated with the existing, adjacent drainage system and would not increase potential for flooding at the site during construction or subsequent operation. The extent of the proposed drainage modifications would be nominal and limited to the immediate fuel farm area and would be less than significant.

The SDIA Additional Fuel Tanks Project would not place housing or structures within a 100-year floodplain (see **Exhibit 4-2**), nor within a tsunami or seiche zone and no impacts resulting from inundation by seiche, tsunami, or mudflow would occur.[52]

The San Diego Bay Watershed Management Area Water Quality Improvement Plan[53] notes that SDRCCA has elected to reduce concentrations of copper and zinc in stormwater discharges. Strategies to achieve this reduction include utilizing advanced BMPs identified in the NPDES permits as well as testing and optimizing stormwater discharge cleaning. The proposed Project would not generate a substantial increase in surface runoff stormwater during operation and, combined with the use of BMPs and adherence to applicable SDIA stormwater management policies during construction, the proposed Project would not conflict with or obstruct implementation of a water quality control plan.

4.11 LAND USE AND PLANNING

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

[51] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.10 – Hydrology and Water Quality,* July 2018.

[52] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.10 – Hydrology and Water Quality,* July 2018.

[53] San Diego Bay Responsible Parties, *San Diego Bay Watershed Management Area Water Quality Improvement Plan*, February 2016. Available: http://www.projectcleanwater.org/san-diego-bay-water-quality-improvement-plan/.

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); Federal Emergency Management Agency (FEMA), December 2018 (floodplains); Ricondo & Associates, Inc., December 2018 (project location).

EXHIBIT 4-2

NORTH 0 1,500 ft

FLOODPLAINS

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4.11.1 DISCUSSION

The SDIA Additional Fuel Tanks Project would result in the construction and installation of three additional fuel tanks at the existing Airport fuel farm. The proposed Project facilities would be consistent with the existing land uses in the area and would not physically divide an existing community. Additionally, the proposed Project would occur entirely on Airport property and no acquisition of additional property would be required.

Land use designations and development regulations applicable to SDIA, including the proposed Project site, are specified in the California Public Trust Doctrine; the SDIA Airport Master Plan; the SDIA Airport Land Use Plan; and the SDIA Airport Land Use Compatibility Plan. The proposed facilities associated with the SDIA Additional Fuel Tanks Project would be consistent with the applicable goals and policies of the aforementioned plans, as discussed below:

- The California Tidelines Trust identifies appropriate uses for tide and submerged lands and includes aviation facilities, including facilities necessary or convenient for the promotion and accommodation of commerce and air navigation.
- The SDIA Airport Master Plan identifies as a goal the utilization of property and facilities efficiently, to prepare measured and incremental improvements that are cost effective to the region's forecast for air service for passengers and cargo; and to be compatible with surrounding land uses and SDRCCA policies. As described in greater detail in Sections 2.1 and 2.2, the proposed Project seeks to provide fuel storage facilities that address existing inefficiencies and shortfalls. Additionally, the location of the proposed Project, adjacent to the existing SDIA fuel farm, would be compatible with surrounding land uses and, as such, the proposed Project would be compatible with the SDIA Airport Master Plan. Facilities associated with the SDIA Additional Fuel Tanks Project would be consistent with the corresponding Airport Support land use as identified for the proposed Project site in the SDIA Airport Land Use Plan.
- Compatibility with the SDIA Airport Land Use Compatibility Plan is limited to airport master plans, amendments to an airport master plan, or airport layout plans. Construction of additional fuel tanks would result in a change to the existing airport layout plan. The proposed fuel tanks would be constructed adjacent to the existing fuel farm within an area currently designated as airport land use and would comply with FAA land use compatibility standards and airport design requirements. Aviation uses are not subject to ALUC review; therefore, compatibility with the ALUCP is not require. However, the proposed Project is compatible with the SDIA Airport Master Plan and consistent with existing uses at the SDIA fuel farm.
- SDIA is located on San Diego Unified Port District (the Port District) property; however, the Airport is independently 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[54]. 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 jurisdictional authority over Airport property and neither the PMP, nor the associated land use designations, are

[54] 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.

applicable to SDIA pursuant to the San Diego County Regional Airport Authority Act. The Port District is in the process of updating the Port Master Plan (referred to as the Port Master Plan Update or PMPU). Consistent with the Port Master Plan, 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 City of San Diego General Plan identifies SDIA as airport land use and sets Airport-specific goals including the minimization of the public's exposure to noise and risk of aircraft accidents and protects the Airport for surrounding incompatible land uses. The City of San Diego Community Plans identify the majority of SDIA and the entirety of the proposed Project site as "Reserve" and not within a designated community plan. As such, the SDIA Additional Fuel Tanks Project would be compatible with existing land use plans, policies and regulations.
- The proposed Project would occur entirely on Airport property and within the coastal zone (see **Exhibit 4-3**); therefore, the CCA is pertinent to the proposed Project. The CCA ensures that development does not interfere with public access to the shoreline, preserving coastal recreational uses and scenic views, while protecting biological habitats and water quality. The proposed Project would not limit public access to the shoreline or coastal recreational uses (see Section 4.16). Impacts to scenic views and aesthetics are discussed in greater detail in Section 4.1; however, the construction of three additional fuel tanks is consistent with existing land uses and viewsheds. Impacts of the proposed Project to coastal scenic views have the potential to be significant and, as such, this topic will be included for detailed analysis, including consistency with CCA policy, under the Aesthetics section of the Draft EIR. The proposed Project also has the potential to result in significant impacts to biological resources and may result in impacts related to hazards and the use and generation of hazardous materials; however, these topics will be addressed in detail, including consistency with CCA policy, in the Biological Resources and Hazards and Hazardous Materials sections, respectively, of the Draft EIR.

4.12 MINERAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

4.12.1 DISCUSSION

The proposed Project site is developed with airport-related uses. The majority of the site is paved with non-contiguous areas of exposed soil and low, sparse brush and grass. There are no actively mined mineral or timber resources on or near the proposed Project site, nor is the site available for mineral resource extraction given the existing land uses. Thus, the SDIA Additional Fuel Tanks Project would have no impact on mineral resources.

SOURCES: San Diego County Regional Airport Authority, *Airport Layout Plan*, 2009; Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, December 2017 (imagery basemap); State of California, Costal Commission, 2014 (coastal zone boundary).

NORTH 0 2 mi

EXHIBIT 4-3

COASTAL ZONE

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4.13 NOISE

WOULD THE PROJECT RESULT IN:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?				X

4.13.1 DISCUSSION

The proposed Project would result in a temporary increase of noise and vibration levels during construction as a result of construction-related traffic and operation of construction equipment. Noise generated during operation of the proposed Project would be consistent with the existing noise environment and would not result in a substantial increase in ambient noise. The Project site is located within a developed, urbanized area consisting of airport, commercial, transportation, and residential land uses. Ambient noise levels in the immediate vicinity of the proposed Project site are characterized by frequent aircraft arrival and departure operations and vehicular traffic along I-5, Pacific Highway, and North Harbor Drive. The nearest noise-sensitive land uses to the proposed Project site are MCRD barracks and a multi-family residential building on Hancock Street located approximately 1,100 feet and 2,200 feet north/northeast of the proposed Project site, respectively. Construction of the proposed Project would occur during normal weekday periods (i.e., 6:00 a.m. to 6:00 p.m.), to the extent possible, for a period of approximately 17 months. Based on 2016 noise contours, these areas are exposed to noise levels near or in excess of 60 dBA Community Noise Equivalent Level (CNEL)[55] which would likely exceed any noise impacts from construction of the proposed Project. Additionally, construction of the proposed Project would require ground improvements; specifically, compaction grouting. Compaction grouting activity would result in ground-borne vibration and an increase in ground-borne noise; however, the vibration and noise are expected to be nominal and localized; therefore, noise and vibration impacts from construction of the proposed Project would be less than significant. Operation of the proposed Project would not generate a substantial amount of noise and would be commensurate with the existing fuel farm operation; thus, operation of the SDIA Additional Fuel Tanks Project would have no impact on noise in the area.

[55] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Figure 3.12-5,* July 2018.

4.14 POPULATION/HOUSING

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

4.14.1 DISCUSSION

The SDIA Additional Fuel Tanks Project does not propose any new residences, businesses, or other development that would induce substantial population growth. Additionally, the SDIA Additional Fuel Tanks Project would not require acquisition of any residential areas or displacement of people as all construction and operations activities would occur on Airport property. As such the proposed Project would have no impact on population/housing.

4.15 PUBLIC SERVICES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
(i) Fire protection?				X
(ii) Police protection?				X
(iii) Schools?				X
(iv) Parks?				X

4.15.1 DISCUSSION

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 City of San Diego is located within the Metro Zone, which also includes Chula Vista, Coronado, National City, Poway, and Imperial Beach. At the Airport, the Aircraft Rescue and Firefighting Facility (ARFF) is staffed and operated by the SDFD and is located adjacent to the proposed Project site. During construction of the proposed Project, the existing ARFF would continue to provide paramedic and fire protection services on the

airfield and at the Airport. Construction activities associated with the proposed Project and operations of the proposed Project would not substantially affect access ingress and egress of the ARFF or otherwise affect station operations and response times. The addition of fuel tanks would increase the number of facilities the SDFD would have to periodically inspect and protect; however, given the limited size of the proposed Project and the Project's consistency with the existing fuel farm, the proposed Project would not degrade the level of service the SDFD provides to the area. The existing fire protection facilities are sufficient to provide fire protection services to the proposed Project and, as such, the proposed Project would not require new or altered fire protection facilities, the construction of which could lead to a substantial adverse physical impact.

The San Diego Harbor Police Department (SDHPD) headquarters are located adjacent to the Airport across North Harbor Drive. In addition to the SDHPD Headquarters, the SDHPD maintains a substation at SDIA within Terminal 1. SDHPD has primary law enforcement jurisdiction on Airport property and is the designated first responder to Airport incidents (including aboard aircraft). The San Diego Police Department (SDPD) provides as needed support to the SDHPD. During construction of the proposed Project, SDHPD and the SDPD would continue to provide law enforcement services at SDIA. Construction activities would result in temporary access restrictions within the areas under construction; however, police access to the construction area and all other SDIA facilities would be maintained at all times in accordance with FAA, Fire Marshal, and Fire Code regulations. Further, the implementation of the proposed Project would not involve the construction of new housing or otherwise induce new growth within the region that would create an increased demand for police services. Therefore, the proposed Project would not require new or altered police protection facilities, the construction of which could lead to a substantial adverse physical impact.

The proposed Project would expand the existing fuel farm function at the Airport. Construction and operation of the proposed Project would not induce population growth in the area that would require new or altered schools or parks.

4.16 RECREATION

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

4.16.1 DISCUSSION

The proposed Project components would not cause an increase in residential uses in the vicinity of the Airport, nor would it provide improved access to existing public recreation areas. The SDIA Additional Fuel Tanks Project EIR would not cause any increase in the use of existing neighborhood and regional parks or other recreational facilities or require the construction or expansion of recreational facilities. Thus, the proposed Project would have no impact on recreation.

4.17 TRANSPORTATION

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

4.17.1 DISCUSSION

Construction of the proposed Project would result in the generation of vehicle trips associated with employee commutes, construction and demolition haul and delivery, and miscellaneous construction-related activities. These trips would result in changes in total vehicle miles traveled during the construction period. Delivery of materials would be scheduled to reduce disruptions to the local surface transportation network. Based on the relatively small scale of construction, changes in total vehicle miles traveled associated with vehicular travel to and from SDIA would be less than significant.

Following construction, the proposed Project would not modify existing on-airport roadways, parking systems, remote parking facilities, rental car facilities, transit systems, or pedestrian and bicyclist activities, nor would it modify off-airport transportation operations. Additionally, the proposed Project would not disrupt transit schedules along Pacific Highway or I-5 and the Sycuan Green Line. However, in lieu of constructing additional fuel storage at SDIA, truck transportation of fuel would be required to maintain the on-airport fuel supply. The assumed trucked fuel operation would result in hundreds of additional weekly tanker truck trips to and from the Airport. The additional tanker truck trips would potentially impact the local surface transportation network and associated traffic flows. The existing fuel distribution system would not be modified as a part of the proposed Project and the number of additional personnel required to operate the additional three fuel tanks would be nominal if at all necessary; therefore, operation of the proposed project would not result in a change in total vehicle miles traveled to and from SDIA by fuel farm staff.

The design of the proposed Project would follow FAA airport design guidelines as well as California Building Code requirements. The proposed fuel tanks would be consistent, in form and function, with the existing fuel farm facility. The proposed Project would not result in any changes to emergency access to the fuel farm or adjacent sites. Therefore, the SDIA Additional Fuel Tanks Project would not substantially increase hazards, due to design, or result in inadequate emergency access to the proposed Project site or the surrounding area.

4.18 TRIBAL CULTURAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).				X
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X

4.18.1 DISCUSSION

A review of the Draft EIR for the San Diego International Airport ADP[56] revealed no record or evidence of unique archaeological resources or known tribal cultural resources being located at or near the proposed Project site. During outreach for the ongoing SDIA ADP EIR, SDCRAA sent letters of "Formal Notification of Consultation Opportunity Pursuant to Public Resources Code Section 21080.3.1" via certified mail on January 19, 2018 to representatives of the 13 Native American tribes identified by the NAHC as being culturally affiliated to the Project area, in accordance with Assembly Bill 52. Each Native American representative listed was sent a project notification letter and map and was informed that pursuant to Public Resources Code Section 21080.3.1(b), the tribe had 30 days from receipt of the letter to request consultation, in writing, with SDCRAA if the tribe was interested in projects at SDIA. The notification letters also provided the option for the tribes to provide a comment letter in lieu of consultation. Representatives from two of the 13 tribes, the Jumal Indian Village and the Viejas Band of Kumeyaay Indians, responded requesting consultation with the SDCRAA for future SDIA construction projects.

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. As noted above, there are no known tribal cultural resources, as defined in Public Resources Code Section 21074, on the Project site. However, 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-

[56] San Diego County Regional Airport Authority, *Draft Environmental Impact Report – Airport Development Plan, San Diego International Airport, Section 3.6 – Cultural Resources,* and *Section 3.7 – Tribal Cultural Resources,* July 2018.

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.

The proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource. There are no known tribal cultural resources located at or adjacent to the proposed Project site. Excavation associated with compaction grouting would be nominal. Approximately 3.5 feet of excavation, within a circular area approximately 60 feet in diameter, would be required for installation of fuel tank foundation slabs. Excavation of approximately 5.5 feet would be required for dike wall foundations. Soils at the proposed excavation depths are comprised of fill material. Should an unknown tribal cultural resource be unexpectedly encountered during Project-related excavation activities, the appropriate resource agencies would be contacted, and construction would cease, pending agency consultation. Thus, impacts on tribal cultural resources from construction of the proposed Project would be less than significant and no further analysis of this issue is required in the Draft EIR.

4.19 UTILITIES/SERVICE SYSTEMS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

4.19.1 DISCUSSION

The proposed Additional Fuel Tanks Project would not result in a substantial increased demand for potable water or electrical power, nor would it generate any substantial wastewater. The proposed Project would not require the construction of any additional potable or sanitary sewer lines; however, the Project would require connections to the existing storm drainage and electrical power infrastructure. Additional pipelines and drainage inlets would be required to integrate the proposed Project with the existing fuel farm drainage system. Electrical utility conduit and ancillary components would be installed to connect the proposed Project to the existing electric utility system. Due to the limited size of the project and adjacency to existing utility systems, the proposed Project would not substantially impact the capacity of existing utility systems or place a substantial additional burden on the potable water system, wastewater treatment systems, or electrical utility systems serving the Airport. As such, the proposed

Project would have a less than significant impact on water and wastewater service systems, storm drain systems, and other utilities.

Construction and demolition activities for the proposed Project are anticipated to generate solid waste; however, the amount of waste is not anticipated to be substantial. Construction debris and other solid waste resulting from the Project would be removed from Airport property and routed for recycling or landfill disposal. No project-related hazardous and/or solid waste would be produced post-construction. Site clearing would result in the removal of existing asphalt; concrete; low, sparse brush and grass; and fill material. Site clearing would comply with federal, state, and local statutes and regulations related to solid waste disposal and diversion. Due to the scale of the proposed Project, demolition activities associated with the proposed Project would not exceed existing landfill capacity. Therefore, the proposed Project would result in less than significant impacts to solid waste.

4.20 WILDFIRE

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

4.20.1 DISCUSSION

The location of SDIA and the proposed Project site is not within or near a State responsibility area or lands classified as very high fire hazard severity zones. The nearest designated fire hazard zone area is approximately 1+ mile to the east of the proposed Project site, opposite I-5 within canyon areas in the Uptown CPA and within Balboa Park farther to the east.[57] therefore, the proposed Project would have no impact related to wildfire risks.

[57] California Department of Forestry and Fire Protection (CAL FIRE), *Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE - San Diego*, June 11, 2009. Available: http://www.fire.ca.gov/fire_prevention/fhsz_maps/FHSZ/san_diego/San_Diego.pdf.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	X			
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	X			
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	X			

4.21.1 DISCUSSION – (A)

The proposed Additional Fuel Tanks Project at SDIA has the potential to degrade the quality of the environment with potential effects on aesthetics, biological resources, and hazards and hazardous materials. Therefore, these topics will be evaluated further in the Draft EIR.

As discussed in Section 4.5, the Additional Fuel Tanks Project at SDIA would not eliminate examples of major periods of California history or prehistory.

4.21.2 DISCUSSION – (B)

Implementation of the proposed SDIA Additional Fuel Tanks Project may result in cumulative impacts when considered with other past, present, and probable future projects at the Airport and in the surrounding area for the topics discussed above. Therefore, the cumulative impacts for the topics of aesthetics, biological resources, and hazards and hazardous materials will be evaluated in the Draft EIR.

4.21.3 DISCUSSION – (C)

Implementation of the proposed SDIA Additional Fuel Tanks Project may result in adverse environmental effects which could potentially result in substantial adverse effects on humans for the topics of aesthetics and hazards and hazardous materials, as discussed above; these topics will be further evaluated in the Draft EIR.

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ATTACHMENT 1

Air Quality Analysis

ATTACHMENT 1 AIR QUALITY ANALYSIS

A.1.1 INTRODUCTION

This Attachment summarizes the methods used to estimate emissions of carbon monoxide (CO), volatile organic compounds (VOCs), oxides of nitrogen (NO_x), oxides of sulfur (SO_x), particulate matter less than ten microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) in support of the Initial Study for construction of three additional above-ground fuel storage tanks at an existing fuel farm (the proposed Project) at San Diego International Airport (the Airport or SDIA).

The emissions analysis was conducted to develop emissions inventories pursuant to the California Environmental Quality Act (CEQA). Specifically, the analysis was conducted to determine whether emissions associated with construction activities would exceed applicable screening-level thresholds specified for projects located within the San Diego Air Pollution Control District (APCD). Construction of the proposed Project elements is anticipated to occur in 2020 and 2021. The proposed fuel tanks would be integrated with the existing fuel farm mechanical conveyance systems. The conveyance systems include active mechanical equipment employed during transfer of fuel between tanks and throughout the Airport's distribution system. No changes to the existing fuel farm distribution system or the larger regional fuel supply distribution system are proposed as a part of the Additional Fuel Tanks Project. Therefore, the operational emissions associated with the proposed Project were not calculated.

A.1.2 REGULATORY SETTING

Under the federal Clean Air Act (CAA), as amended, the US EPA has developed National Ambient Air Quality Standards (NAAQS) for the following air pollutants, referred to as criteria air pollutants: CO, nitrogen dioxide (NO_2), ozone (O_3), sulfur dioxide (SO_2), lead (Pb), PM_{10}, and $PM_{2.5}$. The CAA defines the need to establish two standards—primary standards, which define maximum concentrations of criteria air pollutants to protect public health, and secondary standards, which define maximum concentrations of criteria air pollutants to protect public welfare.

Individual states are required to identify general geographic areas where the NAAQS for these criteria air pollutants are not met. The U.S. EPA designates such areas as nonattainment areas and qualifies the nonattainment status by severity of nonattainment ranging from marginal to moderate to serious to extreme nonattainment. Areas that were in nonattainment but have since attained the NAAQS are considered to be an attainment/maintenance area for several years before being designated as being in attainment. A state with a nonattainment or maintenance area must prepare a State Implementation Plan (SIP) that describes the programs and requirements that the state will implement to attain or maintain the NAAQS by the deadlines specified in the CAA, as well as subsequent related documents promulgated by the U.S. EPA.

The California Air Resources Board (CARB) monitors air quality conditions throughout the state and enforces state air regulations, issues permits, and formulates and maintains SIPs. Under the California Clean Air Act, patterned after the federal CAA, areas are designated as attainment or nonattainment for California Ambient Air Quality Standards (CAAQS).

At the local level, the San Diego APCD is responsible for ensuring that federal and state air quality standards are met by monitoring ambient air pollutant levels throughout the area. The APCD implements strategies to ensure SIP regulations are maintained and issues air quality permits for stationary equipment operating in the area.

For the NAAQS, the San Diego Air Basin is in attainment for NO_2, SO_2, $PM_{2.5}$, and Pb; unclassified for PM_{10}; and moderate nonattainment for the year 2008 and 2015 O_3.[1] Notably, because San Diego County failed to attain the year 2008 NAAQS for O_3 by July 20, 2018, effective September 23, 2019, the USEPA is designating San Diego County as Nonattainment/Serious for the 2008 O_3 NAAQS. San Diego County was historically a nonattainment area for CO, but in June 1998, it was re-designated to attainment for the 8-hour CO NAAQS and remains designated as a maintenance area. For the CAAQS, the San Diego Air Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$; and attainment for CO, NO_2, SO_2, and Pb.

A.1.3 METHODOLOGY

In support of evaluating air quality effects, estimates were prepared for criteria air pollutants (or their precursor compounds) for which the San Diego Air Basin is not in attainment and that may be affected by construction of the proposed Project. Therefore, the air quality analysis is based on the following:

- CO—The San Diego Air Basin is classified as a maintenance area; therefore, emissions were estimated for this criteria pollutant.
- NO_2— The San Diego Air Basin is in attainment with federal and state standards; therefore, emissions were not estimated for this criteria pollutant.
- O_3—Volatile organic compounds (VOCs) and nitrogen oxides (NO_x) are primary precursor compounds that lead to the formation of O_3; therefore, VOC and NO_x emissions were estimated in the air quality analysis to evaluate O_3 effects.
- Pb—Although Pb is a criteria air pollutant, it was not evaluated in the analysis because the proposed Project would not affect Pb emissions. The only source of Pb emissions at the Airport is aviation gasoline, and the proposed Project would not change the number of aircraft operations or routing of aircraft on the ground or in the air.
- PM_{10} and $PM_{2.5}$— The San Diego Air Basin is classified as nonattainment for state standards; therefore, emissions were estimated for these criteria pollutants.
- SO_2— The San Diego Air Basin is in attainment with federal and state standards, so emissions were not estimated for this criteria pollutant.

A.1.3.1 MODELS

The California Emissions Estimator Model (CalEEMod) was used to estimate the construction emissions associated with the proposed Project. CalEEMod was originally developed for the California Air Pollution Officers Association in collaboration with the South Coast Air Quality Management District (SCAQMD) as a modeling tool to assist local public agencies with estimating emissions from construction and operation of land use development projects. The model estimates emissions from a wide variety of land use development projects, such as residential neighborhoods, shopping centers, office buildings, etc. The model also identifies potential mitigation measures and associated

[1] SDAPCD Attainment Status, www.sandiegocounty.gov/content/sdc/apcd/en/air-quality-planning/attainment-status.html (accessed January 28, 2019); U.S. Environmental Protection Agency, Greenbook Nonattainment Areas, www3.epa.gov/airquality/greenbook/index.html (accessed January 9, 2019).

emission reductions. CalEEMod calculates emissions for CO, reactive organic gases (ROG),[2] NO_x, SO_2,[3] PM_{10}, $PM_{2.5}$, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) for both on-road and off-road construction sources. The model uses the California Air Resources Board's (CARB) EMFAC2014 model for on-road vehicle emissions and the CARB's OFFROAD2011 model for off-road vehicle emissions.

The EMFAC2014 model calculates motor vehicle emission rates for vehicles ranging from passenger cars to heavy-duty trucks, operating on highways, freeways, and local roads in California. In CalEEMod, default or user-defined vehicle activity data is used to derive total vehicle miles traveled (VMT), which is multiplied by appropriate EMFAC2014 emission factors to calculate on-road emissions. EMFAC2014 emission factors are region/county specific. For purposes of this analysis, emission factors specific to San Diego County were selected in CalEEMod. Vehicle emission factors account for starting, running, and idling exhaust. In addition, ROG emission factors, specifically VOCs, include running loss emissions, while the PM_{10} and $PM_{2.5}$ emission factors include tire and brake wear. CalEEMod also calculates on-road fugitive dust associated with paved and unpaved roads. Default values for parameters required by CalEEMod to calculate fugitive dust from on-road vehicles are based on recommendations in U.S. EPA AP-42.[4]

To estimate off-road construction equipment-related exhaust emissions, CalEEMod uses the OFFROAD2011 model to generate emission factors for construction equipment, which are based on an average fleet mix that accounts for the turnover rate and average emissions for specific types of construction equipment. Depending on the construction phase, CalEEMod generates default values for number and types of construction equipment, horsepower, load factor, and daily operating hours. The model allows the user to override these values as appropriate. Default values are used for purposes of this analysis unless otherwise noted. CalEEMod assumes that all off-road construction equipment burns diesel fuel. For each piece of equipment selected, CalEEMod generates an emissions estimate using the following equation:

*Equipment Emissions (pounds/day) = # of pieces of equipment * grams per brake horsepower-hour * equipment horsepower * hours/day * load factor*

In association with off-road construction equipment, CalEEMod calculates fugitive dust (PM_{10} and $PM_{2.5}$) emissions from material movement, including haul road grading, earth bulldozing, and truck loading. Fugitive dust emissions from material movement are calculated using the methodology described in U.S. EPA AP-42.

A.1.3.2 THRESHOLDS OF SIGNIFICANCE

The evaluation of significance involves identifying if the proposed Project would cause pollutant concentrations to exceed one or more of the NAAQS or CAAQS for any of the time period(s) analyzed or would increase the frequency or severity of any such existing violations. Therefore, the proposed Project was evaluated for conformity with the applicable SIPs.

Pursuant to CEQA, the County of San Diego has published screening level thresholds for air quality analyses. If project emissions exceed the thresholds, specific modeling is required for NO_2, SO_2, CO, and Pb to demonstrate that the project's ground-level concentrations (including appropriate background levels) do not exceed the NAAQS and

[2] For purposes of this analysis, it was assumed that estimates of VOC emissions are equal to calculated emissions of ROG.

[3] For purposes of this analysis, it was assumed that estimates of SO_X emissions are equal to calculated emissions of SO_2.

[4] U.S. Environmental Protection Agency, *AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition*, January 1995, as supplemented and amended.

CAAQS. For ozone precursors (NO_x and VOC), PM_{10} and $PM_{2.5}$, exceedances of the thresholds result in a significant impact, since the San Diego Air Basin is currently not in attainment for PM_{10}, $PM_{2.5}$, and ozone.

Table A-1 summarizes the California and federal air quality emissions thresholds applicable to this air quality analysis.

TABLE A-1: CALIFORNIA AND FEDERAL AIR QUALITY EMISSIONS THRESHOLDS

POLLUTANT	CALIFORNIA SCREENING-LEVEL THRESHOLDS		FEDERAL DE MINIMIS THRESHOLDS
	LBS. PER DAY	TONS PER YEAR	TONS PER YEAR[1]
Respirable Particulate Matter (PM_{10})	100	15	100
Fine Particulate Matter ($PM_{2.5}$)	55	10	100
Oxides of Nitrogen (NO_x)	250	40	50
Oxides of Sulfur (SO_x)	250	40	100
Carbon Monoxide	550	100	100
Lead and Lead Compounds	3.2	0.6	25
Volatile Organic Compounds (VOCs)	75	13.7	50

NOTE:
1 Where applicable, federal *de minimis* levels depicted on this table are for moderate nonattainment areas.
SOURCES: U.S. Environmental Protection Agency (federal *de minimis* thresholds); County of San Diego Land Use and Environment Group, *Guidelines for Determining Significance and Report Format and Content Requirements*, March 19, 2008.

A.1.4 ASSUMPTIONS

Construction of the proposed Project would result in short-term changes in air pollutant emissions from sources such as: exhaust emissions from off-road construction equipment, haul trucks, and construction worker vehicles; and fugitive dust emissions from grading, materials handling, and vehicles traveling on paved and unpaved roads.

CalEEMod is capable of estimating emissions for several types of construction activities (phases) including site preparation, grading, building construction, architectural coating, and paving. Each phase has one or more unique components, such as fugitive dust, off-road construction equipment exhaust, on-road vehicle exhaust, and off-gassing. CalEEMod estimates emissions separately by phase and by phase component. Each component is assumed to generate emissions throughout the entire phase length. This section describes and presents assumptions used to estimate construction emissions for the proposed Project.

The following components were modeled in CalEEMod with respect to the proposed Project:

- **Site preparation**—In CalEEMod, the site preparation phase involves clearing low, sparse brush and grass and removing stones and other unwanted material or debris prior to grading. This phase includes the removal of existing pavement in the project area. It was assumed that 10 inches of pavement material over an area of 35,000 square feet would be excavated and removed from the site.
- **Grading**—Grading of the entire site area (35,000 square feet) was assumed. This phase accounts for excavation required for providing foundations for the three fuel tanks. Because the precise method of foundation construction is unknown, it was assumed that the entire 35,000 square-foot site would be excavated to a depth of 48 inches, with excavated material hauled off site.

- **Foundation paving**—The paving phase includes the laying/pouring of concrete. This phase also includes the hauling of concrete material to the site. Concrete was assumed to be poured on-site to construct the fuel tank foundations. The amount of concrete required for the project was estimated assuming a diameter and height of 58 feet per tank, with each tank sitting on a 48-inch concrete foundation.
- **Dike wall paving**—An additional paving phase was included to account for construction of the new and rebuilt/enhanced concrete dike walls surrounding the new tanks. Approximately 380 feet of dike walls were assumed to be constructed to a height of six feet and a thickness of one foot.
- **Tank installation**—This phase includes the actual construction of the three proposed fuel tanks atop the concrete foundations. Default construction equipment as assigned by CalEEMod for building construction on a light industry land use was assumed for this phase.
- **Surface coating**—This phase includes surface coating of the storage tanks. The area of exterior surface coating was calculated to reflect the total surface area of the three proposed tanks. The total surface area is based on 47,533 square feet to reflect the surface area of the three tanks with a diameter of 58 feet and a height of 58 feet using a surface coating factor of 250 grams per liter (CalEEMod default for exterior surface applications).

Table A-2 depicts the construction schedule assumed for the proposed Project elements. The length of each construction phase was based on default CalEEMod settings based on the total project area (35,000 square feet) and scaled upward to reflect a proposed construction schedule of 17 months. Construction of the proposed Project is assumed to occur in 2020 and 2021.

TABLE A-2: ESTIMATED CONSTRUCTION SCHEDULE

	WORKDAYS		
CONSTRUCTION PHASE	2020	2021	TOTAL
Site Preparation	30		30
Grading/Excavation	36		36
Concrete Foundation	30		30
Dike Walls		30	30
Tank Installation		200	200
Surface Coating		10	10

NOTES:
Assumes 5 working days per week. Workdays were based on construction start and end dates that were assumed for emissions modeling purposes only. The general timeframe for project completion, along with specific construction start and end dates are subject to environmental clearance, permitting, contractor procurement, and other factors.
SOURCES: Ricondo & Associates, Inc., January 2019, based on information provided by Burns & McDonnell, *SAN Tanks Project Information*, November 12, 2018, and default calculations performed within the California Emissions Estimator Model.

Table A-3 depicts assumed off-road construction vehicle usage and specifications for construction of the proposed Project. CalEEMod default equipment types, amounts, usage, and specifications were assumed.

TABLE A-3: OFF-ROAD CONSTRUCTION EQUIPMENT BY CONSTRUCTION PHASE

EQUIPMENT TYPE BY PHASE	UNIT AMOUNT	USAGE (HOURS/DAY)	HORSEPOWER	LOAD FACTOR[1]
Site Preparation				
Graders	1	8.00	187	0.41
Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading/Excavation				
Concrete/Industrial Saws	1	8.00	81	0.73
Rubber Tired Dozers	1	1.00	247	0.40
Tractors/Loaders/Backhoes	2	6.00	97	0.37
Foundation Paving				
Cement and Mortar Mixers	4	6.00	9	0.56
Pavers	1	7.00	130	0.42
Rollers	1	7.00	80	0.38
Tractors/Loaders/Backhoes	1	7.00	97	0.37
Dike Walls				
Cement and Mortar Mixers	4	6.00	9	0.56
Pavers	1	7.00	130	0.42
Rollers	1	7.00	80	0.38
EQUIPMENT TYPE BY PHASE	UNIT AMOUNT	USAGE (HOURS/DAY)	HORSEPOWER	LOAD FACTOR[1]
Tractors/Loaders/Backhoes	1	7.00	97	0.37
Tank Installation				
Cranes	1	4.00	231	0.29
Forklifts	2	6.00	89	0.20
Tractors/Loaders/Backhoes	2	8.00	97	0.37
Surface Coating				
Air Compressors	1	6.00	78	0.48

NOTE:
1 Load factor is defined as the average operational horsepower output of an engine divided by it rated horsepower.
SOURCE: Ricondo & Associates, Inc., January 2019, based on default equipment specifications within the California Emissions Estimator Model.

Table A-4 depicts the on-road vehicle assumptions used in the emissions analysis for the proposed Project.

TABLE A-4: ESTIMATED ON-ROAD VEHICLE TRIPS

	NUMBER OF TRIPS			TRIP LENGTH (MILES ONE-WAY)		
CONSTRUCTION PHASE	WORKER TRIPS PER DAY	VENDOR TRIPS	HAULING TRIPS	WORKER TRIPS	VENDOR TRIPS	HAULING TRIPS
Site Preparation	5	-	216	10.8	7.3	20
Grading/Excavation	10	-	648	10.8	7.3	20
Foundation Paving	18	-	299	10.8	7.3	20
Dike Walls	18	-	17	10.8	7.3	20
Tank Installation	15	6	100	10.8	7.3	20
Surface Coating	3	-	-	10.8	7.3	20

SOURCE: Ricondo & Associates, Inc., January 2019, using the California Emissions Estimator Model.

Assumptions regarding on-road vehicle trips for this project are as follows:

- **Worker trips**—CalEEMod default values were used for worker trips. CalEEMod applies a factor of 1.25 workers per piece of construction equipment in each phase to estimate worker roundtrips. Default values in CalEEMod for worker trip length were also used.
- **Hauling trips**—During the site preparation phase, hauling trips were assumed to carry demolished pavement material from the site. Based on a site area of 35,000 square feet and a pavement depth of 10 inches, a total of approximately 1,080 cubic yards of pavement material estimated to weigh 2,160 tons was assumed to be hauled from the site. This quantity was divided by an assumed 20 tons hauling capacity of a haul truck and multiplied by two for a roundtrip. Default hauling trip lengths were assumed were assumed for all hauling activities.

  During the grading phase, hauling trips were assumed to carry excavated material from the site. Based on an excavation area of 35,000 square feet and a depth of 48 inches, a total of 5,185 cubic yards of material was assumed to be hauled from the site. This quantity was divided by the CalEEMod default assumption of 16 cubic yards hauling capacity of a truck and multiplied by two for a roundtrip.

  Hauling trips required to deliver concrete to the site for constructing the tank foundations were estimated by calculating a footprint area of 3,364 square feet per tank and a foundation depth of 48 inches. Deliveries of concrete for construction of the dike walls were estimated assuming 383 linear feet of walls at one inch thick and a height of six feet, for a total volume of 85 cubic yards of concrete. All concrete quantities were divided by an assumed 10 cubic yards hauling capacity of a concrete mixer truck and multiplied by two for a roundtrip.
- **Vendor trips**—A total of 100 trips were assumed for delivering fuel tank components, piping, and other materials to the site during the tank installation phase.
- **Vehicle mix**—In assigning a vehicle mix, CalEEMod allows for the selection of several options. For worker vehicles, this analysis assumes a mix of 50 percent light-duty auto (i.e., passenger car), 25 percent light-duty truck type 1 (LDT1), and 25 percent light-duty truck type 2 (LDT2). Haul trips and vendor trips were assumed to be heavy heavy-duty truck (HHDT) vehicles.

A.1.5 SUMMARY OF CONSTRUCTION EMISSIONS

Table A-5 summarizes the annual and daily emissions of criteria air pollutants estimated for construction of the proposed Project, which would occur in 2020 and 2021, and compares the annual emissions with the federal *de minimis* thresholds and California screening level thresholds presented in Table A-1. Even with the short-term increase in emissions from the construction of the proposed Project, emission levels would be below all thresholds. Changes in criteria air pollutant emissions as a result of construction of the proposed Project would not result in an adverse effect on air quality and would not require mitigation.[5]

TABLE A-5: ANNUAL EMISSIONS OF CRITERIA POLLUTANTS DUE TO CONSTRUCTION OF THE PROPOSED PROJECT

CONSTRUCTION YEAR	CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$
Annual Emissions (Tons/Year)						
2020	0.362	0.048	0.586	0.001	0.051	0.033
2021	0.924	0.688	1.09	0.002	0.079	0.060
Federal *de minimis* Threshold	100	100	100	100	100	100
California Tons per Year Threshold	100	13.7	40	40	15	10
Significant?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Daily Emissions (Pounds/Day)						
2020	9.168	1.149	14.038	0.027	1.751	1.060
2021	8.017	55.332	9.705	0.015	0.670	0.532
California Pounds per Day Threshold	550	75	250	250	100	55
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE:
CO—Carbon Monoxide
NO_X—Oxides of Nitrogen
PM_{10}—Particulate Matter less than ten microns in diameter
$PM_{2.5}$—Particulate Matter less than 2.5 microns in diameter
SO_X—Sulfur Oxides
VOC—Volatile Organic Compounds
SOURCE: Ricondo & Associates, Inc., January 2019, using the California Emissions Estimator Model.

[5] A Memorandum of Understanding between the California Attorney General and the San Diego County Regional Airport Authority regarding the SDIA Airport Master Plan specifies the use of green construction methods and equipment. (State of California and San Diego County Regional Airport Authority, *Memorandum of Understanding Between the Attorney General of the State of California and the San Diego County Regional Airport Authority Regarding the San Diego International Airport Master Plan*, May 5, 2008.) In particular, the Airport Authority is to require that firms performing construction use equipment that either runs on alternative fuels or employs CARB-certified particulate traps, to the extent permitted by federal law and state contracting law, for construction projects for which the Airport Authority determines that such equipment is commercially available. For purposes of this analysis, such measures were not assumed, therefore resulting in a more conservative estimate of potential air quality impacts.

APPENDIX B

Notice of Preparation

Subject: Notice of Preparation of a Draft Environmental Impact Report

Lead Agency:

Agency Name	San Diego County Regional Airport Authority
Mailing Address	P.O. BOX 82776 San Diego, CA 92138
Physical Address	3225 N. Harbor Drive San Diego, CA 92101
Contact	Ted Anasis

The San Diego County Regional Airport Authority (SDCRAA) will be the CEQA Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the view of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The SDCRAA is requesting input from interested governmental and quasi-government agencies, other organizations and private citizens regarding the scope and content of environmental information to be included in the EIR. Public agencies receiving this notice may need to use the EIR prepared by the SDCRAA when considering their permits or other approvals for the proposed project.

Any public agencies that respond to this Notice of Preparation are requested, at a minimum, to:

1. Described significant environmental issues, reasonable alternatives and mitigation measures that they would like to have addressed in the Draft EIR.
2. State whether they are a responsible or trustee agency for the project, explain why and note the specific project elements that are subject to their regulatory authority.
3. Provide the name, address and phone number of the person who will serve as their point of contact throughout the environmental review process for this project.

The project description, location and the potential environmental effects are contained in the attached materials.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but **not later than 30 days** after receipt of this notice.

Please send your response to Ted Anasis, AICP, at the mailing address shown above. We will need the name for a contact person in your agency.

Project Title: San Diego International Airport – Additional Fuel Tanks

Project Location: San Diego (City (nearest)) San Diego County (County)

Project Description: See the following description of the proposed project.

Date: November 28, 2018 Signature

Title Manager, Airport Planning

Telephone 619.400.2478

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375

In 1995, two 1-million gallon jet fuel storage tanks were constructed at San Diego International Airport (SDIA) to provide a reliable jet fuel supply for aircraft operating at SDIA. The jet fuel tanks are located north of Runway 9-27 and the Aircraft Fire Fighting and Rescue Station, east of the Marine Corps Recruiting Depot, and west of W. Washington Street and the Airport Traffic Control Tower. Although the existing jet fuel storage tanks can nominally hold 2-million gallons of jet fuel, the actual usable fuel storage capacity of the existing tanks is 1.71 million gallons. In 2018, the maximum daily jet fuel usage at SDIA was approximately 782,000 gallons in July, which is the typical peak month of travel at SDIA. Thus, during peak periods, SDIA has just over a two-day supply of jet fuel, which leaves the airlines operating at SDIA vulnerable to interruptions or problems with the jet fuel supply pipelines delivering fuel to the storage tanks. The industry standard is to have a five-day supply of jet fuel on hand to protect against fuel supply interruptions and to minimize the potential for disrupting aircraft operations. Additionally, as the existing jet fuel tanks are over 20 years old, they need to be re-lined, which requires them to be emptied and taken off-line. Although the existing fuel facility has the ability to receive fuel via trucks, SDIA prefers not to undertake the re-lining of the tanks without an alternative method of storing and supplying jet fuel to aircraft that does not involve a large number of fuel trucks delivering fuel to the Airport during the time it would take to complete this task.

The Fuel Farm Expansion Project (the Proposed Project) at SDIA, comprises three 1.15-million gallon above-ground fuel storage tanks, each with a usable storage volume of approximately 966,000 gallons; concrete containment dike walls; accessory piping, pipe supports and foundations; concrete equipment pads; steel platforms and stairs; extension and modifications to the existing fire suppression system; and an associated underground drainage system. The three proposed new tanks would be constructed immediately northeast of the existing jet fuel storage tanks on existing Airport property, and would be approximately 58 feet in diameter and 58 feet tall. The containment area consists of a gravel surface with a liner beneath isolating the containment area from surrounding surfaces and soils. The Proposed Project would extend the existing containment area to accommodate the addition of the three new tanks. The existing southern containment wall would be partially demolished to act as an intermediate dike wall, this allows for the new tanks and the existing tanks to have one large shared containment area. Additional intermediate walls would be installed between the new tanks as well. The whole shared containment area, existing and new, would be sized to contain the total volume of fuel of the largest tank should a catastrophic event occur, and all the fuel from the tank is released.

The Proposed Project would also include demolition of existing asphalt and concrete within the proposed work area, grading, utility relocation, and ground improvement. The purpose of the Proposed Project is to increase jet fuel storage capacity at SAN from an approximately two-day supply to an approximately six-day supply, thereby increasing operational reliability and reducing the Airport's dependency on fuel trucking services. Based on a review of the project site, known environmental conditions, and the project characteristics, the potential significant environmental effects of the Proposed Project are anticipated to be related to aesthetics (visual), biological (coastal) resources, hazards and hazardous materials, and cumulative effects.

SOURCES: San Diego County Regional Airport Authority, Airport Layout Plan, 2009; ESRI Basemap, Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, 2018 (aerial imagery).

EXHIBIT 1

NORTH 0 1,400 ft.

PROJECT LOCATION

P:\GIS\Projects\SAN\MXD\SAN_FuelTanks_Location_20181119.mxd

APPENDIX C

Notice of Preparation Comments

From: Alan Gordon <agordonnoise@gmail.com>
Sent: Friday, December 28, 2018 12:43 PM
To: Airport Planning
Cc: Alan Gordon
Subject: NOP for EIR of Fuel Farm Expansion Project

San Diego Regional Airport Authority
Attention: Ted Anasis

Dear Sirs, I have reviewed the Fuel Farm Expansion Project and have the following comments for the draft EIR.

1) I think the proposed size of the fuel containment area is inadequate and needs to be reviewed. Having the containment area large enough to contain only the total volume of the single largest tank, of the total five tanks, is insufficient. If there was a catastrophic event, such as an earthquake or a plane or vehicle hitting the fuel farm, it seems likely that more than one tank would be impacted and the containment area needs to address this.
2) The 58 foot height of the proposed tanks, that far exceeds the costal commission 30 foot height limit, needs to be reviewed in the EIR.
3) The EIR also needs to address the impact of climate change and the resulting rising sea levels. The impact of rising sea level needs to be evaluated for the impact on the structural integrity of the proposed project as well as the biological risk the rising sea level has for the large increase in storage of hazardous fuel.

Thank you for your consideration,

Alan Gordon
4404 Alhambra St.
San Diego, CA 92107
858-245-7213

Sent from Mail for Windows 10

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DEC 28 2018
BY: .....

From: Pascual, Elena <EPascual@sandiego.gov>
Sent: Friday, December 21, 2018 5:05 PM
To: Airport Planning
Cc: Hansen, Mike; Muto, Alyssa; Vonblum, Heidi; Malone, Rebecca; Stephens, Mark; Cedeno, Meghan; Gonsalves, Ann; Morrison, Susan
Subject: City of San Diego Comment Letter on the Notice of Preparation for the San Diego International Airport Fuel Farm Expansion Project
Attachments: Final City of San Diego Comment Letter on the NOP for the SDIA Fuel Farm Expansion Project.pdf

Dear Mr. Anasis:

Thank you for the opportunity to review the Notice of Preparation for the San Diego International Airport Fuel Farm Expansion Project. Please see the attached City of San Diego comment letter on the NOP. Please let us know if you have any questions.

Thank you,
Elena

Elena Pascual
Environmental Planner
City of San Diego
Planning Department

T: 619-533-5928
EPascual@sandiego.gov

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The City of
SAN DIEGO
Planning Department

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BY: .....

December 21, 2018

Ted Anasis, Manager, Airport Planning
San Diego County Regional Airport Authority
3225 N. Harbor Drive
San Diego, CA 92101

Subject: **CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT FOCUSED ENVIRONMENTAL IMPACT REPORT FOR THE SAN DIEGO INTERNATIONAL AIRPORT FUEL FARM EXPANSION PROJECT**

Dear Mr. Anasis:

The City of San Diego ("City") Planning Department has received the Notice of Preparation (NOP) prepared by the San Diego County Regional Airport Authority (SDCRAA) and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the NOP and appreciates this opportunity to provide comments to the SDCRAA. The City looks forward to continued coordination with the SDCRAA and other local, regional, state, and federal agencies. In response to this request for public comments, the City has the following comments on the NOP for your consideration.

• • •

TRANSPORTATION & STORM WATER DEPARTMENT – MARK G. STEPHENS, ASSOCIATE PLANNER – MGStephens@sandiego.gov, 858-541-4361

The Storm Water Division leads the City's efforts to protect and improve water quality of rivers, creeks, bays, and the ocean, and is generally responsible for inspection, operation, maintenance, and repair of storm drain systems in the public right-of-way and drainage easements. Thus, aspects of project development, operation, and maintenance that could affect water quality or the storm drain system are of priority interest.

1. The Notice of Preparation (NOP) of a Draft Focused Environmental Impact Report (EIR) and the Notice of Availability issued by the San Diego County Regional Airport Authority describe the three proposed new tanks as being constructed immediately northeast of the existing jet fuel storage tanks on existing Airport property. This appears inconsistent with the southwest location of the two existing above ground tanks shown on NOP Exhibit 1, Project Location.

DEVELOPMENT SERVICES DEPARTMENT – MEGHAN CEDEÑO, ASSOCIATE TRAFFIC ENGINEER – MCedeno@sandiego.gov, 619-446-5357

1. Any Transportation Impact Analysis in the DEIR should follow the guidelines of the City of San Diego Traffic Impact Study Manual, July 1998, and should apply the City of San Diego CEQA Significance Determination Thresholds, July 2016, for all transportation facilities within the City of San Diego evaluated.

2. The DEIR should include a discussion and potentially an analysis of any construction traffic impacts of the proposed project.

• • •

Thank you for the opportunity to provide comments on the NOP. Please contact me directly if there are any questions regarding the contents of this letter or if the SDCRAA would like to meet with City staff to discuss our comments. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at RMalone@sandiego.gov or by phone at 619-446-5371.

Sincerely,

Heidi Vonblum, Program Manager
Planning Department

RM/ep

cc: Reviewing Departments (via email)
Review and Comment online file

From: Misleh, John <John.Misleh@sdcounty.ca.gov>
Sent: Friday, December 21, 2018 9:54 AM
To: Airport Planning
Cc: Hines, Colleen; Rapista, Robert; Bennett, Mary; Preece, Sharon; Pence, Sande
Subject: 11/28/18 Notice: Fuel Farm Expansion Project at SDIA, Draft EIR Comments
Attachments: SDIA Proposed Fuel Farm Expansion Public Notice.pdf

Ted Anasis, Manager, Airport Planning
San Diego International Airport (SDIA)
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

Dear Mr. Anasis,

Attached are the comments for this project from the County of San Diego, Hazardous Materials Division.

John Misleh, Program Coordinator
County of San Diego
Department of Environmental Health
Hazardous Materials Division
858-495-5672
http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html

Help us make sure our customers have a positive experience. Please take 60 seconds to provide us with your feedback.

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BY: .....

County of San Diego

ELISE ROTHSCHILD
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
Phone: (858) 505-6700 or (800) 253-9933 Fax: (858) 505-6786
www.sdcdeh.org

AMY HARBERT
ASSISTANT DIRECTOR

December 20, 2018

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DEC 21 2018
BY: .....

Ted Anasis, Manager, Airport Planning
San Diego International Airport (SDIA)
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

Sent via e-mail to: planning@san.org

COMMENTS: 11/28/18 Notice: Fuel Farm Expansion Project at SDIA, Draft EIR Preparation

Dear Mr. Anasis:

Thank you for the opportunity to comment on the referenced project. The County of San Diego Hazardous Materials Division (HMD) is responsible for the protection of public health and the environment by ensuring hazardous materials, hazardous waste, medical waste and underground storage tanks are properly managed. The HMD has completed their review and has the following comments regarding the project.

The proposed project would include the following components as stated in the Notice:
The Fuel Farm Expansion Project (the Proposed Project) at SDIA, comprises three 1.15-million gallon above-ground fuel storage tanks, each with a usable storage volume of approximately 966,000 gallons; concrete containment dike walls; accessory piping, pipe supports and foundations; concrete equipment pads; steel platforms and stairs; extension and modifications to the existing fire suppression system; and an associated underground drainage system. The three proposed new tanks would be constructed immediately northeast of the existing jet fuel storage tanks on existing Airport property, and would be approximately 58 feet in diameter and 58 feet tall. Demolition, grading, and ground improvements in the area to prepare for the construction will be conducted. The potential significant environmental effects of the Proposed Project are anticipated to be related to aesthetics (visual), biological (coastal) resources, hazards and hazardous materials, and cumulative effects.

Please be advised, any and all construction-related hazardous waste (examples: used oil, paint waste, lead paint debris, etc.) generated onsite must be properly classified, labeled and handled in manner to prevent release to the environment. In addition, SDIA and/or contractor(s) must ensure

hazardous waste generated during all project work is properly classified, labeled and disposed by a California registered hazardous waste hauler. Unified Program Facility Permit may also be required for the accumulation and storage of these wastes. More information is found at this webpage: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazwaste.html

COMMENTS:

1. According to the project description in the document, an increase in hazardous materials will handled/stored at the facility requiring a revised hazardous materials business plan submittal to the HMD in CERS. The facility operator is required to submit a Hazardous Materials Questionnaire to the HMD and complete a HMD Hazardous Materials Plan Check review prior to issuance of a certificate of occupancy by a Building Department. For your reference, information regarding the plan check requirement can be reviewed at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html

2. Please be advised, any proposed activities during construction and after completion of the Fuel Farm Expansion Project involving hazardous materials or generating hazardous waste will require the operator(s) to update the facility's Unified Program Facility Permit through the California Environmental Reporting System (CERS) and comply with local/state laws, and regulations. Webpage for CERS: https://cers.calepa.ca.gov/

3. The three (3) new above-ground fuel storage tanks under the proposed project would require a revised Spill Prevention Control and Countermeasures Plan (SPCC) and demonstrate compliance with the Aboveground Petroleum Storage Act, Cal. Health and Safety Code, sections 25270 etc. The operator shall complete the SPCC plan and retain a copy onsite for inspection by the HMD. Also, if a fueling rack or a fuel recovery tank is constructed, the SPCC regulations for the aboveground containers, piping, and tanks are applicable and should be addressed.

4. Please note, anytime during construction and after completion of the Fuel Farm Expansion Project, the HMD has the authority pursuant to state law and County Code to regulate facilities that handle or store hazardous materials, and/or generate or treat hazardous waste. The HMD will apply that authority as necessary to protect public health and the environment. Additional regulatory guidance information can be found on our website at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat.html.

5. If soil and/or groundwater contamination containing a hazardous substance is discovered or encountered during excavation, construction, or grading activity, SDIA shall investigate the contamination and report the release to the HMD and applicable State/federal agency. Some environmental assessment and/or remediation work may involve several regulatory oversight agencies. If a release of hazardous waste is discovered as part of this project, timely reporting of the release in writing to the County and State oversight agencies may be required pursuant to State laws. Webpages for more information: https://www.dtsc.ca.gov/SiteCleanup/Brownfields/upload/SB-2057.pdf and https://www.waterboards.ca.gov/sandiego/water_issues/programs/smc/scp.html

6. If an underground storage tank (UST) is unexpectedly discovered during site work which previously held a hazardous substance, SDIA shall apply for a UST removal permit in accordance with State law before removing the tank and connected piping. Information about the permitting process and laws is found at: https://www.sandiegocounty.gov/deh/hazmat/ust/hmd_ust_construction.html

7. If SDIA is planning for this project on installing a UST system or underground sump/vault to collect and/or store a hazardous substance, a UST installation permit may be required by State law and County ordinance before construction of the system. Information about the permitting process and laws is found at the weblink listed in #6 above.

   Please be advised, underground piping associated with an airport hydrant system (AHS) and connected to above-ground fuel storage tanks may be regulated as an underground storage tank (UST) system. If 10 percent or more of the total storage capacity is underground, then the AHS meets the definition of a regulated UST system. The calculation must include all aboveground and underground tanks storing aircraft fuel and all underground piping. More information on regulating AHS including examples to assist in performing the calculation is found at: https://www.epa.gov/sites/production/files/2017-10/documents/fct-ahs-10-4-17-final508.pdf If a fueling rack with a fuel recovery, fuel drainage/collection tank, or spill tank is installed underground, the State UST regulations for underground tank systems may be applicable and should be addressed.

8. If SDIA will be installing an unburied tank system in an underground area/structure or in a vault as part of the project, there are new regulations and laws for these systems. Information can be found at: http://osfm.fire.ca.gov/cupa/pdf/TIUGA-Laws-n-Regs_04Apr2018.pdf

The HMD appreciates the opportunity to participate in the environmental review process for this project. If you have any questions regarding these comments, please contact Robert Rapista at (858) 505-6818 or by e-mail at robert.rapista@sdcounty.ca.gov

Sincerely,

Dec 21 2018 10:54 AM

Misleh, John

X

Misleh, John

cosign

John Misleh, Program Coordinator
Hazardous Materials Division

Email Ecc: Mary Bennett, DEH
Robert Rapista, DEH-HMD

Sharon Preece, HMD
Colleen Hines, LWQD-DEH
DEH file record: DEH2002-HUPFP-201141

From: gillian ackland <acklandgm@hotmail.com>
Sent: Wednesday, December 19, 2018 11:51 AM
To: Airport Planning
Subject: Fuel tank Draft EIR

795 Bellevue Place

La Jolla, CA 92037

12/19/18

RECEIVED
DEC 19 2018
BY: .....

SDCRAA Attn: Ted Anasis

Ref: Draft EIR for additional fuel tanks

The airport at Lindbergh field is blighting the city with noise and pollution. The proposed projects has significant impacts to the aesthetics , biological (coastal) resources, hazards and hazardous materials and cumulative effects which are not adequately defined or avoided in the project.

This project will only increase the already adverse effects on the city, the people and the environment in which we live and is therefore not in the best interests of the residents and should be rejected.

I strongly object to the predicted proposal

Gillian Ackland

WORLDWIDE ENGINEERING SERVICES COMPANY
WESCO

JAMES GILHOOLY
President

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Presidente

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PLAYAS DE ROSARITO • BAJA CA
FROM US 1 619-223-9768 • FAX 1 619 223-8939

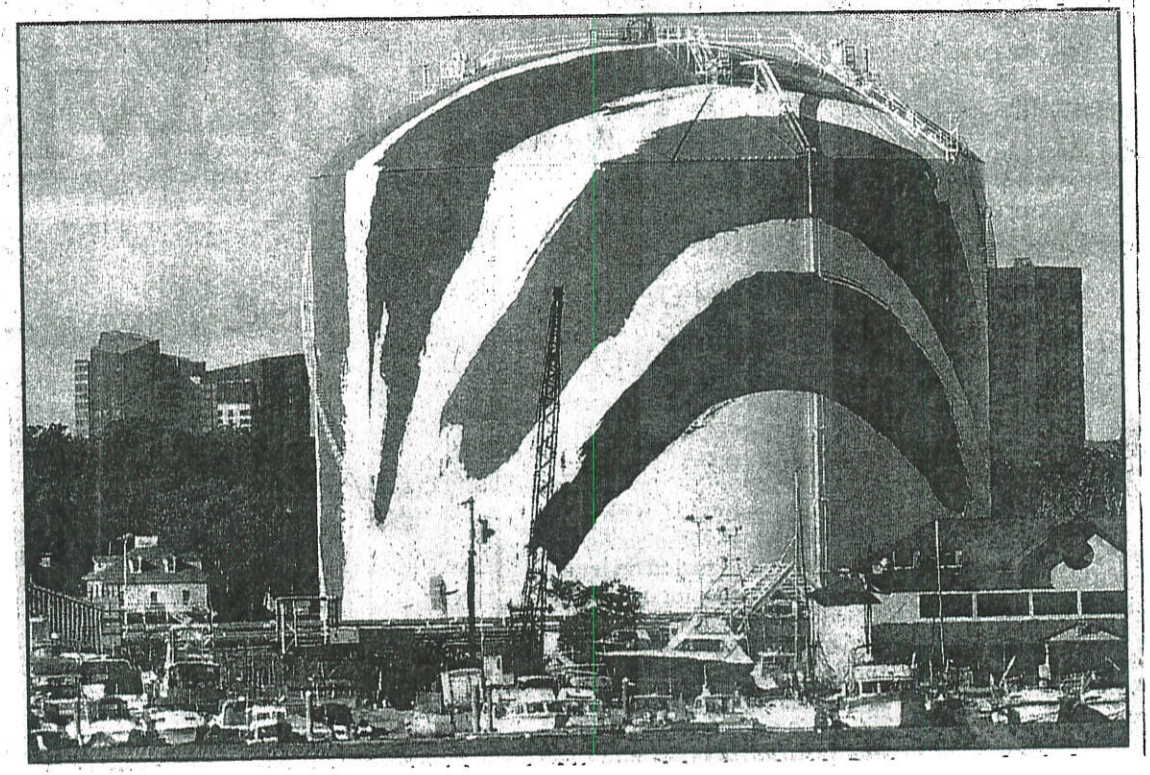
RECEIVED
DEC 2 0 2018

BY: .....

TYPICAL OIL STORAGE TANK

THREE
58' 0"
DIAMETER
X
58' X 0" TALL
TANKS

THINK
MODULARIZATION
?



NOTE

CONVENTIONAL (STICK-BUILT)(FIELD)(ERECTION
INVOLVES MULTIPLE STACKED COURSES
A ROOF (MULTIPLE SECTIONED PLATES)
A BASE (MULTIPLE SECTION PLATES)

FIELD WELDING ON TANKS THIS SIZE CONSUME
SOME 9000 LBS OF ELECTRODES USING SMAW - SAW AND
FLUX-CORED WELDING
PROCEDURES

LINDBERGH AIRPORT
PROJECT

FUEL TANK FARM EXPANSION

ADDITION OF THREE(3) FUEL TANKS AND EXPANSION OF CONCRETE FOUNDATION AND RINGWALLS TO ACCOMMODATE RELIABLE JET FUEL SUPPLY FOR AIRCRAFT OPERATING AT S.D.I.A.

QUESTIONS

1) WHAT IS THE LOCATION OF NEW FUEL FACILITY TO POPULATION CENTERS, PASSENGER TERMINALS, ETC., ETC.

2) IS THE NEW FUEL FARM IN A "EXCLUSION ZONE" TO ISOLATE FUEL LEAKS FROM GENERAL PUBLIC & PROPERTY

(3) HAS A BUFFER ZONE BEEN SET UP.

(4) ACTUAL DISTANCES FROM PROPERTY LINES.

(5) ARE STANDARDS, PREVENTATIVE MEASURES USED TO PROTECT CONSTRUCTION PERSONNEL, GENERAL PUBLIC, PASSENGERS FROM LEAKS EXPLOSIONS, FIRE, NOISE AND THE EFFECTS OF NATURAL PHENOMENA.

(6) HAVE BUILDING LAND USE, DEVELOPMENT AND ENVIRONMENTAL PERMITS BEEN GRANTED FOR FUEL FARM.

7) HAS THE SAFETY OF GENERAL PUBLIC ADDRESSED IN PERMIT DISCUSSIONS

8) IS DESIGN IN ACCORDANCE, NFPA- NFC.- API

IF FOREIGN STEEL IS UTILIZED ON U.S. PROJECTS MAKE SURE CONTRACTOR PASSES ON DISCOUNT PRICE!

5

WESCO
WORLDWIDE ENGINEERING SERVICES COMPANY

James Gilhooly

3451 TRUMBULL STREET
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SUBJECT: Utilization of Chinese Steel Materials for Global - International TANK & Boiler Contracts.

Thousands of Boilers produce steam for heating, power generation in the People's Republic of China.

All of the ASME/ASTM materials (Plates, Pipes, Tubes, Etc.,) for these boilers were designed and manufactured from Chinese domestic sources.

All of the personnel in the [redacted]. boiler facilities are very experienced in the design, engineering, manufacturing and construction of these domestic materials.

With a view to utilizing Chinese materials in boilers and equipment for the Global and International markets I would recommend that a comparison of Chinese steel material properties, (chemical - Physical - Mechanical, etc.,) and operational experience be made, and documented against foreign codes and specifications such as ASME - DIN - JIS -, etc. If the properties of the Chinese steel materials are compatible to the other Global market steel materials. All boiler steel for export/Global equipment contracts could be sourced in China, resulting in cost and schedule savings which may give S.B.W. the competitive edge in the Global markets as well as increasing jobs in China for domestic craftsmen.

James Gilhooly

James Gilhooly
President

MATERIAL ?
STEEL ?

THE CHINESE/KOREAN MILLS HAVE FLOODED GLOBAL MARKETS WITH QUESTIONABLE CHEAP STEEL MATERIAL.

CHECK, ENSURE CHEMICAL/PHYSICAL, MECHANICAL DOCUMENTATION IS SUPPLIED.

PROJECT

FUEL TANK FARM EXPANSION CONT'D

9) NFPA (NATIONAL FIRE PROTECTION ASSOC)
N.F.C (NATIONAL FIRE CODE)
OSHA (DEPT. OCCUPATIONAL SAFETY/HEALTH

10) HAS AN ENVIRONMENTAL IMPACT REPORT STATEMENT ON INTIAL FUEL FARM BEEN COMPLETED?

FACTS

SPECIAL REPORT GREG. 3

WELDING FUMES

F.Y.I.

WELDING FUMES SPARK CONTROVERSY

Toxic-substance legislation tightens standards for employee exposure and emissions. Manufacturers must identify hazards and keep workplace-air quality within OSHA limits. Ventilation is key to keeping exposures low.

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AIR POLLUTION

Sources of Air Pollution

Stationary Combustion

Industrial, commercial, and household sources; including power plants, manufacturing plants, open burning dumps, home fireplaces and furnaces, incinerators, agricultural and forest waste disposal. Includes natural sources such as volcanoes, forest fires, etc.

Mobile Combustion

Confined to transportation industry and includes autos, trains, aircraft, ships, buses, which normally utilize internal combustion, steam-driven, or gas turbine engines. Also includes natural sources such as dust storms, electrical storms, etc.

Types of Air Pollutants

Gases and Vapors

Small size particles normally make these air pollutants difficult to remove. Methods include absorption, adsorption or incineration. Common polluting gases include sulfur dioxide and trioxide, hydrogen chloride, chlorine, and oxides of nitrogen. Vapors include hydrocarbons, trace metals, fluorine, and others.

Liquid Particulates

Easy to remove in above-3 micron size; below 3 microns and in sub-micron sizes, special equipment is required to remove particulates, normally at higher cost. Special problems can occur when liquids are highly flammable or corrosive. Common examples include sulfuric acids and other acids, organic compounds, and even water in some cases.

Solid Particulates

Same degrees of difficulty exist with solid particulates as with liquids. related to micron size. Soluble solids can be removed by adding water to dissolve and cause them to drain from filter mechanisms. Insoluble solids require other forms of control. Examples are fly ash, products of incomplete combustion, dust, chemical compounds, and minerals.

Odors

Odors are normally in gas or vapor forms. They cause irritation and undesirable reactions when perceived by the olfactory sensors. Common sources are chemical plants, paper mills, stockyards, slaughterhouses, and some food processing operations.

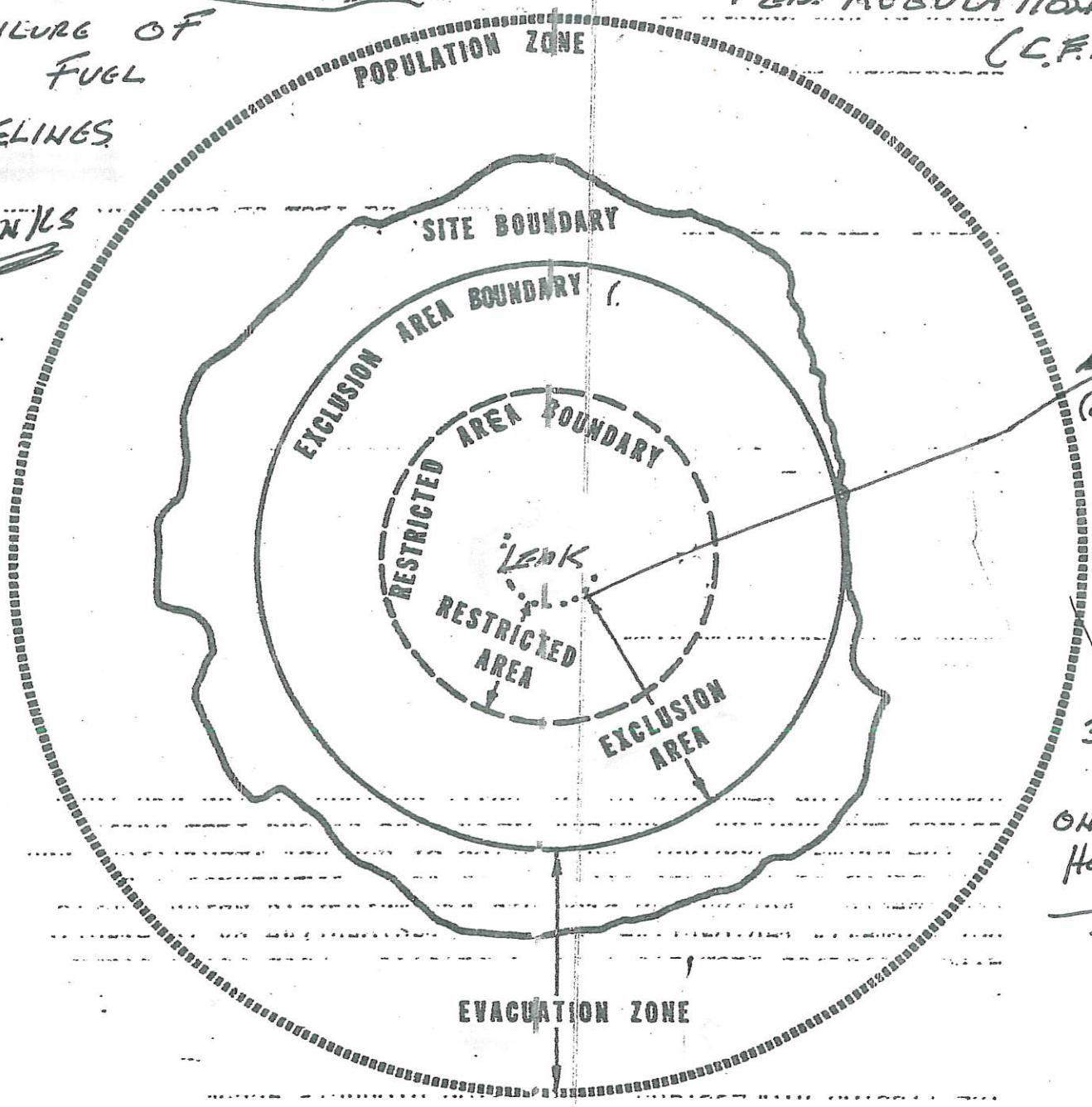
AIR POLLUTION BECAME A MAJOR ISSUE ON NAVY POINT LOMA PROJECT.

(FIELD WELDING, SANDBLASTING ETC. OF NEW FUEL TANK FACILITY ___ ?

EXCLUSION MAP

FEDERAL REGULATIONS (C.F.R)

FAILURE OF FUEL PIPELINES TANKS



NOTE: IN SOME CASES, THE RESTRICTED AREA BOUNDARY, THE EXCLUSION AREA BOUNDARY AND THE SITE BOUNDARY MAY BE CONTIGUOUS.

QUESTION: ARE SPECIAL SAFEGUARD SYSTEMS & SAFETY FEATURES BUILT INTO THE DESIGN OF FUEL STORAGE TANKS → TO PROTECT PUBLIC. ?

CONCEPTUAL BOUNDARIES

SAN DIEGO INTERNATIONAL AIRPORT

SUBJECT: FIELD WELDING OF NEW FUEL OIL TANKS, PIPING, VALVES.

REF. WELDING FUMES (AIR CONTAMINANTS
29 CFR
S.A.R.A TITLE III

WELDING FUMES ON SUBJECT PROJECT WILL BE A CONTROVERSIAL TOPIC AND A MAJOR CONCERN OF S.D.I.A. BASED ON THE AMOUNT OF STICK BUILT WELDING PROPOSED IN THE ERECTION OF TANKS, PIPING & VALVES.
S.D.I.A & ITS CONTRACTORS MUST IDENTIFY HAZARDS ASSOCIATED WITH WELDING, DEVELOP AND MAINTAIN WORK PRACTICES WITHIN OSHA LIMITS TO PROTECT THE WORKERS, PUBLIC, PUBLIC AREAS UNDER CURRENT TOXIC SUBSTANCE LEGISLATION.
THIS IS JUST ANOTHER REASON WHY S.D.I.A SHOULD CONSIDER THE MODULAR APPROACH IN FACTORY/SHOP MANUFACTURE OF THESE LARGE FUEL TANKS.

Jim Gilhooly

MODULARIZATION

FACT

EQUIPMENT COSTS HAVE RISEN 68% SINCE YEAR —— 2017

MODULARIZATION

THE TERM MODULARIZATION IS USED TO DEFINE A SERIOUS OF CONSTRUCTION TECHNIQUES, THAT HAVE THE POTENTIAL FOR LOWERING OVERALL PROJECT COSTS TRAFFIC CONJESTION, ENVIRONMENTAL PROBLEMS ON PROPOSED NEW TANK FARMS COMPARED TO

CONVENTIONAL STICK BUILT TANK FARMS

MODULAR DESIGN AND CONSTRUCTION TECHNIQUES DEVELOPED FOR OFFSHORE AND ALASKA HAVE BEEN APPLIED TO NUMEROUS APPLICATIONS THROUGHOUT THE UNITED STATES WITH GREAT RESULTS.

STUDIES HAVE ESTABLISHED THAT MODULAR DESIGN & SHOP ASSEMBLY CONCEPTS HAVE IMPROVED OVERALL CONST. SCHEDULES, REDUCED LABOR HOURS, IMPROVED ENVIRONMENTAL CONDITIONS.

Jim Galloway

COST SAVINGS FROM MODULARIZATION

WESCO

SINGLE STANDPIPE TANK PROJECT # 285129

COST SAVINGS FROM MODULARZATION

(% Of Stick-Built Cost)

Item	Cost Effect	
	Savings	Added Cost
Craft wage rates and overheads	3.0%	
Better labor efficiency at preassembly yard (SHOP)	6.0%	
Better labor efficiency at field construction site	0.8%	
More bulk materials are required		0.3%
Home office costs increase		0.9%
Additional module handling and transportation costs		1.3%
Total Cost Effect	9.8%	2.5%
Net Cost Savings	7.3%	

Table 1.1 shows the projected percents of "stick-built" cost relating to savings and added cost for a typical TANK project. The major increase is handling and transportation cost followed closely by increased Engineering Cost. The handling and transportation cost are quite visible, the increased Engineering Cost are not.

Engineering Cost increases are directly related to increases in drawings required for intermodule interfaces, specifications, systems control of schedules; coordination of work in the home office against procurement, material control, planning, logistics and transportation requirements for the module assembly site and the construction site.

PENINSULA PLANNING BOARD

CONFIDENTIAL

From: "Dee Wylie" <deewylie1@cox.net>
Subject: PCPB – Community Liaison Group meeting: July 18, 2007 - 4:00
Date: July 14, 2007 6:00:03 PM PDT
To: "James Gilhooly"

Dear Mr. Gilhooly, — PRO - BONO WORK

Thank you for your information. I can see it is very important and hope our schedule can accommodate you this coming Thursday.

RETIRED

This is the meeting to which I referred. We only have one person on this committee and he is not a board member. His name is John Adriany and he has worked with the Navy in civilian capacity and is highly creditendialed as well. He is alarmed about some of the things the Navy has not been upfront about and we can't seem to get others as concerned.

NOTE OIL PLUME LEAK

There is so much work to be done here on the Peninsula and folks like your self can make a big difference.

If you would like to be involved this would be a big help for us

I look forward to meeting you and having you on the schedule.

D. Wylie ChairPeninsula Community Planning

From: "Dee Wylie" <deewylie1@c
Date: September 18, 2007 2:48:5
To: <ghalbert@ci.santee.ca.us>, <valg
Subject: FW: Info from D.

JULY 2007

Hi Gary and Jim,

Gary I am sending this on to you with an introduction to Jim Gilhooley came and spoke with us about the Digester Gas project and is in fact with Jay and Darold on that issue. I have gotton more acquainted with him as he has been attending the Navy Plume meetings and as an expert consultant in this field has had very valuable input. Please call Jim hear also his ideas about the many projects and the traffic gridlock th will result. Jim's # is 619-223-9768

Thanks Gary and Jim,

D.

PART OF OVERSIGHT TEAM ON ~~NAVY PROJECTS~~ MULTIPLE NAVY PROJECTS

WESCO WORLDWIDE ENGINEERING SERVICES COMPANY

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Management Consulting
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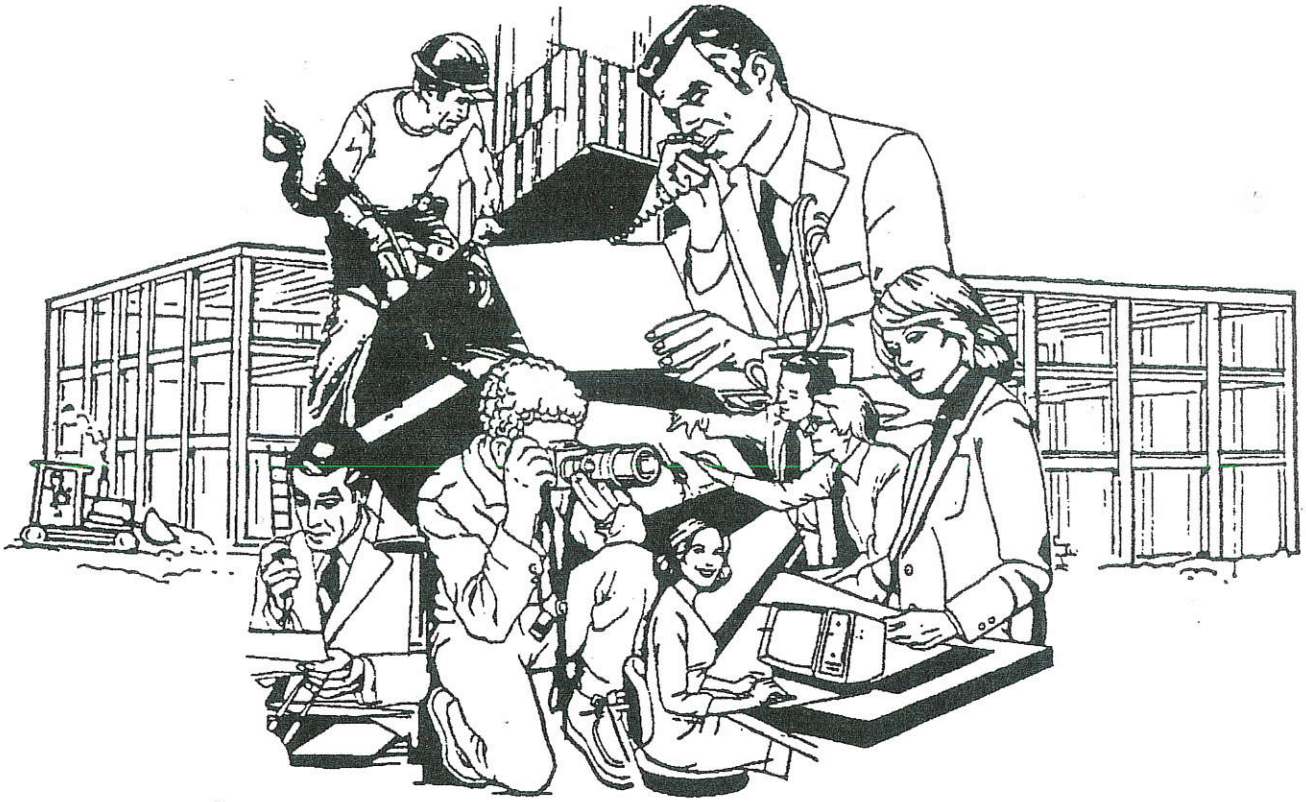
Project Troubleshooting



SOCIO/POLITICAL ISSUES

- Organized Public Opposition Groups
  - Siting (NIMBY)
  - Long Development Period
- Health Risk Assessments

40 YEARS - EXPERIENCE

WWESCO

WORLDWIDE ENGINEERING SERVICES COMPANY

James Gilhooly

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SAN DIEGO CA 92106
TEL (619) 223-9768
FAX (619) 223-8939

REFINERIES AND CHEMICAL PLANTS

WWESCO has developed and successfully used Inspection and testing processes for the following systems, units, and associated parts.

Piping/Tubing, all type and size of fluid and gaseous

Distribution systems

Reactors

Compressors & sub-systems including piping

Condensers

Lube oil systems

Hydraulic systems

Grease systems

Boilers - All types and sizes

Heaters & coolers

TOWERS

Fractionating towers

Stabilizing towers

Debutanizers

Depropanizers

Rerun towers

Distillation towers

De-ethanizers

Glycol towers

Furfural towers

Absorbers

Side-cut strippers

Alkylation strippers

Others

Tanks, vessels - All sizes, construction & configurations.

SAN DIEGO INTERNATIONAL AIRPORT

QUALITY AUDIT & SURVEILLANCE PLAN FOR ALL FUEL TANK JOBSITES (ERECTION AND NON-ERECTION SCOPE)

A. AUDIT AND REVIEW ERECTION CONTRACT QUALITY REQUIREMENTS, DRAWINGS, SPECIFICATIONS AND RESPONSIBILITIES WITH CONTRACTOR

B. AUDIT AND REVIEW COMPLETE S.D.I.A AND COMMERCIAL INSPECTION PROGRAMS WITH CONTRACTORS, WHERE APPLICABLE.

C. AUDIT AND REVIEW WELDING PROGRAM, INCLUDING WELD PROCEDURES, OPERATOR QUALIFICATIONS, WELD SCHEDULE, WELD MAPS, ETC.

D. AUDIT AND REVIEW JOBSITE RECEIVING, NONCONFORMANCE AND BACKCHARGE PROCEDURES.

E. AUDIT AND REVIEW BOTH AIRPORT & CONTRACTOR INSPECTION TRAVELERS.

F. AUDIT AND REVIEW AUTHORIZED INSPECTION AGENCY INVOLVEMENT.

G. AUDIT AND REVIEW PREHEAT AND P.W.H.T. PROCEDURES.

H. AUDIT AND REVIEW OVERALL N. D. E. PROCEDURES AND REQUIREMENTS.

I. AUDIT AND REVIEW HYDROSTATIC AND FUEL TIGHTNESS PROCEDURES.

J. REVIEW PROPOSED API & NON-API DOCUMENTATION PACKAGES.

U.S NAVY
SAN DIEGO
PT. LOMA
FUEL FARM
REPLACED.

Award-Winning Tanks Take Miles of Welds

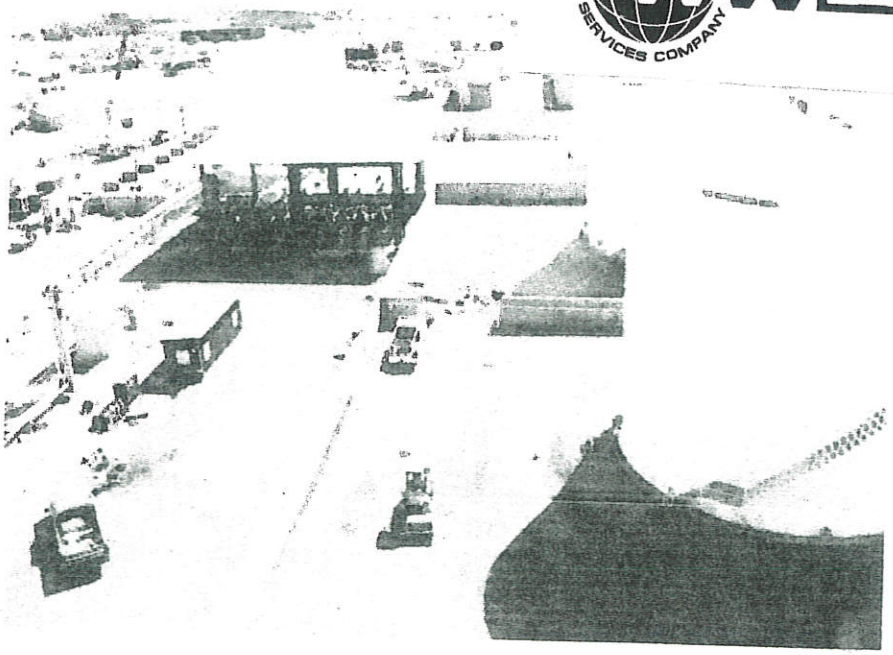
U.S NAVY (S.D.)
COMPLETE
FUEL FARM
RENEWED
POINT LOMA

DFSP POINT LOMA - REPLACE FUEL STORAGE FACILITIES
FISC SAN DIEGO, CALIFORNIA

(*) REPLACING ELEVEN (11) ABOVE GROUND AND 43 (UNDERGROUND TANKS)
3000 VALVES AND 30 MILES OF FUEL PIPING.

NAVY – NORTH ISLAND – SAN DIEGO

WESCO



Naval Station North Island, San Diego, California (Completion: June 2004)
Client: U.S. Navy

This project involved the construction of four new 13,500 barrel aboveground jet fuel (JP-5) bulk storage tanks with cathodic protection, leak detection, secondary containment and automatic high level shutoffs. Also included in the project construction was a 2,400 GPM pumphouse with fuel pumping equipment and programmable PLC panel, carbon steel fuel distribution piping, a truck loading and unloading station, utilities, and site improvements.

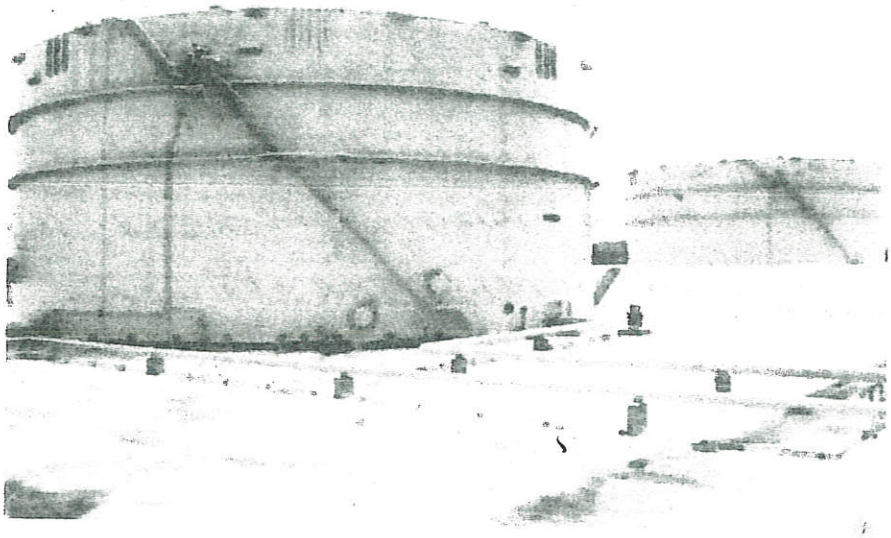
Nova also constructed two new hot refueling sites with the installation and welding of approximately 340 linear feet of direct buried double contained fuel pipe, 165 linear foot jack and boring of casings for double contained fuel pipe under two active taxiways and two concrete fueling stations for aboveground fuel pipe and pantograph systems. These two new hot refueling stations feed from the new aboveground fuel storage tanks and pumping station.

Nova incorporated four existing 500,000 Gallon underground fuel storage tanks into the system with the new aboveground tanks.

Upon completion of all construction activity, Nova's specialty fueling system supplier Bay Associates, conducted the system start-up, commissioning, testing and system prove-out prior to use by the military.

NAVY - GUAM FUEL SYSTEM

WESCO



Andersen Air Force Base, Guam
(Completion: October 2002)
Client: U.S. Navy

Phase 2: Nova installed a new Military Type III hydrant fueling system with a 2,400 gallon-per-minute (GPM) precast, 3,750 SF concrete pumphouse. The mechanical fueling equipment included 600 GPM fuel transfer pumps, numerous control valves, issue filter separators, receipt filter separators and micronic filter, a Pump Logic Control (PLC) panel and graphic display panels, 400 kW emergency power Generator; 12 kV/480 volt Motor Control Center and Main Distribution Board, other electrical panels and interior lighting.

Also constructed were two 1,590 cubic meter (10,000 BBL) vertical aboveground JP-8 steel fuel storage tanks with a fixed cone roof structure and aluminum honeycomb floating plans. Nova resurfaced the site with 88,350 SF of Asphalt Concrete pavement and 74,500 SF of POL Area 8" and 5" thick Portland Cement Concrete.

The new work on the apron was separated into 3 phases of construction that included over 15,000 lf of buried 14" stainless steel piping. The airfield concrete pavement work consists of approximately 183,000 SF 12" thick and pavement stripping removal and replacement.

Phase 5: Nova constructed two 15,900 cubic meter (100,000 BBL) aboveground JP-8 jet fuel steel storage tanks with a center pipe supporting fixed cone roof and a pumphouse, installed transfer pumps, control valves, filter separators, micronic filters, PLC panel, graphic display panels, and 400kW emergency power generator. Nova removed ten 50,000 gallon underground jet fuel and two 1,500 gallon waste fuel tanks; 10,500 LF of underground receipt and issue piping, ten hydrant outlets and lateral control pits and pumphouses with interior piping and fuel equipment.

U.S. ARMY - ALASKA - FUEL FARM
ELMENDORF

WESCO

Elmendorf Air Force Base, Alaska
(Completion: February 2000)
Client: U.S. Army Corps of Engineers

This project consists of construction of three new 83,300 barrel (bbl) aboveground welded steel jet fuel (JP-8) bulk storage tanks with fixed roofs, floating pans and impervious dikes, 12,200 linear feet of 12 inch receipt pipeline, a new 1,800 gallon-per-minute (gpm) pumphouse/operations building, a truck fill stand, and two fiberglass low point pits. Site improvements included pavement and two access roads, water service, 12 kV electrical service, and deep well cathodic protection. Security fencing and lights were also required.

The 1,200-square foot pumphouse construction consisted of a new structural steel building complete with four Union 600 gpm pumps, five M.E. Industries fuel filter separators, CLA-VAL control valves, General twin seal plug valves, a programmable PLC system, and a fire protection alarm system. Due to the extreme weather conditions in Alaska, the pumphouse required a complete heating and ventilation system in addition to being a completely enclosed facility. A 4,000 gallon product recovery tank was installed adjacent to the pumphouse.

The project required the installation of an additional 8,200 linear feet of direct bury carbon steel 10" issue pipe adjacent to the 12" receipt line. Pig launchers and receivers are also included. The new 10" issue line connects the new bulk fuel storage tanks to the West Ramp Hydrant Fuel System (installed by Nova under another contract).

Also included was demolition of four aboveground 25,000 bbl North Jet Fuel Tanks and two aboveground 20,000 bbl South Jet Fuel Tanks.

LARGE FUEL TANK FARM - PHILIPPINES

WORLDWIDE ENGINEERING SERVICES CO

WWESCO

PHILIPPINES

PROJECT PROVIDE MODERN

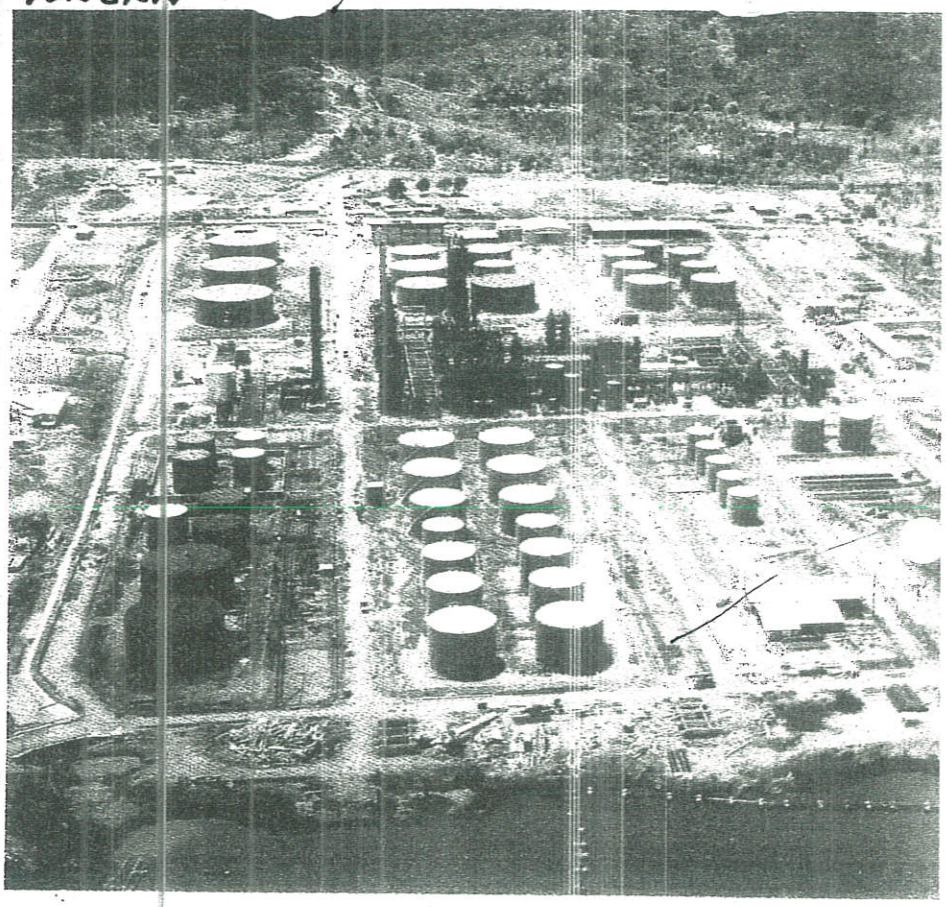
DIMENSIONS OF. GOVERNED BY SIZE OF TANKS.

SIZE OF OPERATIONAL BUILDINGS // OFFICE WASHROOMS

FUEL LINES, PUMPS, VALVES BACK-UP GENERATOR

DECK HAS TO BE SAFE HEIGHT ABOVE HIGH TIDE OR FLOOD LEVEL.

AREA SHOULD BE DREDGED TO ACCOMMODATE LARGE TANKS



Above right: Philippine Petroleum Corporation — Supply and fabrication of 58 vertical storage tanks for a tank farm in Pililla, Rizal.

STABILITY OF PIER & BANKS MAYBE IN JEOPARDY. BECAUSE OF AGE & DETERIORATION IMPACT LOADS

* SUGGEST DRIVING STEEL SHEET PILES BELOW LEVEL OF SEA BED WITH THEIR HEADS SUPPORTED BY STEEL TIE RODS TO CONCRETE ANCHOR BLOCKS SET BACK TO STABLE GROUND.

PUMP LOGIC CONTROLS

AUTO SHUT-OFF VALVES

FIRE ALARMS / EMERGENCY GENERATOR

FUEL TRUCK LOADING BACK-UP OPTION

WESCO

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
2301 AIRPORT BLVD. P. O. BOX 2288
MOBILE, ALABAMA 36601

IN REPLY REFER TO

AREA ENGR, VAAP

TANKS
PIPELINES
CHATTANOOGA
JOLIET
RADFORD

10 June 2012

INSP.

COMPLETE TANK FARM
FUEL (TANKS/PIPING/VALVES)
STATIONS AT

LOCATION 1 — CHATTANOOGA TENN.

LOCATION 2 - JOLIET ILL.

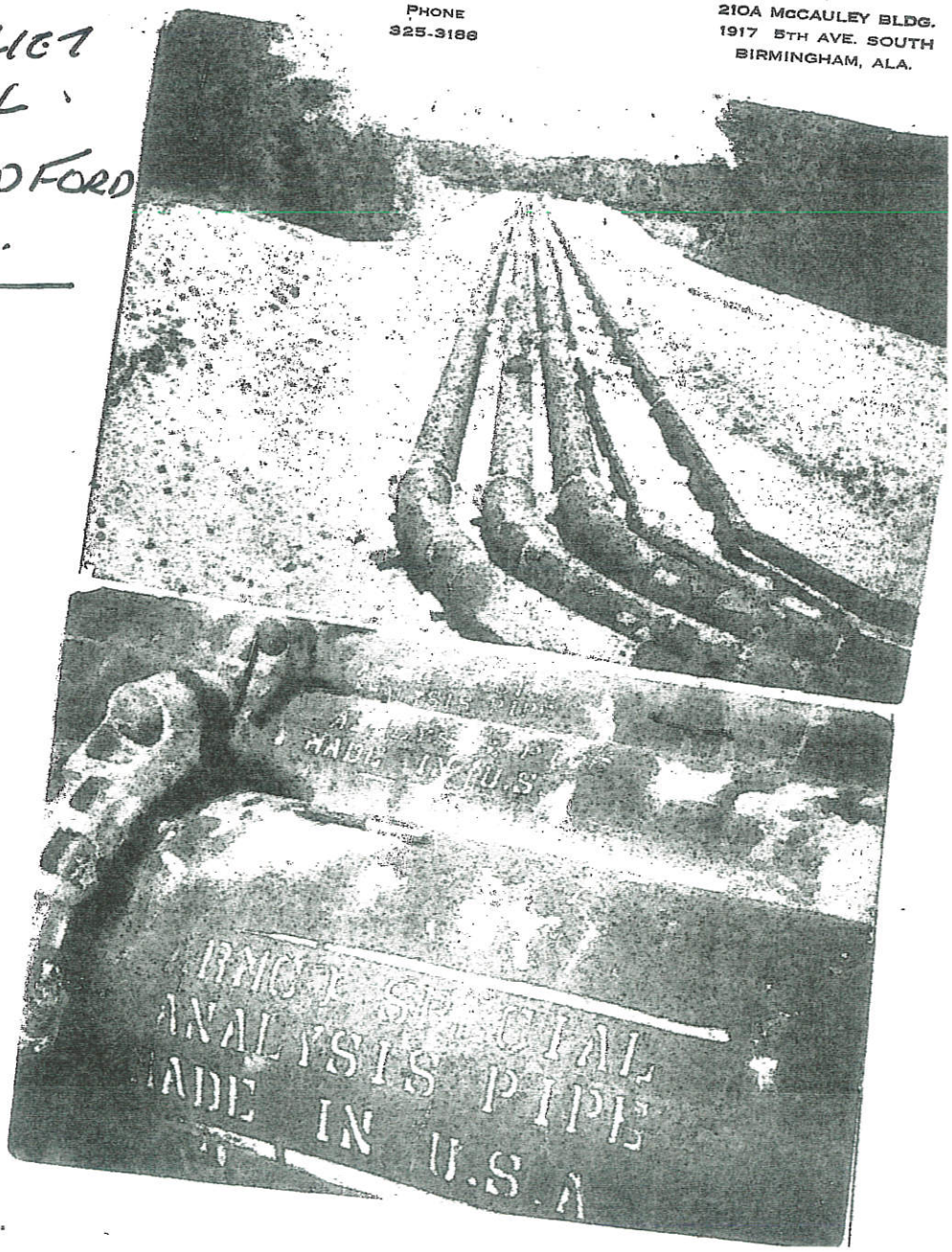
LOCATION 3 - RADFORD VA.

DANIEL A. HIXON
RESIDENT INSPECTOR
U.S. ARMY CORPS OF ENGINEERS
BIRMINGHAM INSPECTION OFFICE

PHONE
325-3188

210A McCAULEY BLDG.
1917 5TH AVE. SOUTH
BIRMINGHAM, ALA.

NOTE — 2012
MADE
IN AMERICA
STENCILS ON ALL
PIPELINES/TANKS



SUBMITTED OVERSIGHT / AUDIT BID IN 1997 ON LINDBERGH CONST. PROJECT.

Port of San Diego

and Lindbergh Field Air Terminal

(619) 686-6200 • P.O. Box 488, San Diego, California 92112-0488

February 27, 1997

Mr. James Gilhooly
WWESCO
3451 Trumbull Street
San Diego, California 92106

Dear Mr. Gilhooly:

Subject: Lindbergh Field Construction Program

Your recent letter to Commissioner David Malcolm has been referred to me for action. In November 1996 the Board of Port Commissioners retained Deloitte & Touche Consulting Group to prepare a thorough analysis of the Lindbergh Field Construction Program (LFCP). The report, finalized on February 4, included comprehensive recommendations to enable the District to complete the work on time and within a reasonable budget. On February 4 the Board approved a budget for the completion of the LFCP and directed staff to implement the recommendations included in the report.

Your letter included suggestions as to how the District could move toward successful completion of the program. Many of the items you noted have been incorporated into the program. Several, such as regular meetings with the contractors, have been taking place for well over a year while others have been incorporated in the past few months. In addition, the Deloitte & Touche report provided the District with a detailed recovery plan. (NOTHING ON CONST. CLAIMS!) FROM DELOITTE.

The District is confident effective implementation of the recommendations in the Deloitte & Touche report will ensure the program is completed on time and within the established budget. The lessons learned from this experience are valuable and are already being applied to other areas of the District.

Thank you for your interest in the District. We are always interested in identifying qualified consultants to assist staff in meeting our goals.

! DELOITTE PROGRAM OKAY ON PAPER! NEEDS HANDS ON OVERSEER IN FIELD TO ENSURE ELEMENTS OF PROGRAM ARE CARRIED OUT IN ACCORDANCE WITH COSTS AND AGREED UPON "SCHEDULE"

Field Construction Program, your experience, your area of expertise and opportunities for the future.

Sincerely,

GRADY D. DUTTON
Senior Director, Public Works/
Chief Engineer

GDD:aw:6971

TEL - 686 - 6238

cc: Board of Port Commissioners
Lawrence M. Killeen, Executive Director

3/14/97

DELOITTE/TOUCHE PROGRAM RECOMMENDATIONS

LOOKS OKAY ON PAPER!
NEEDS - HANDS ON OVERSIGHT IN THE FIELD.
TO ENSURE ELEMENTS ARE CARRIED OUT
IN ACCORDANCE WITH COSTS AND AGREED UPON
"SCHEDULE"

DELOITTE DID NOT ADDRESS CONST. CLAIMS!
RESOLVING DISPUTES!
AMONG CONTRACTORS!
OVERLAPPING SCHEDULES!
PROTECTING AIRPORT FROM QUESTIONABLE
CONTRACTOR CLAIMS!

From: Katheryn Rhodes <laplayaheritage@gmail.com>
Sent: Friday, December 28, 2018 3:59 PM
To: Airport Planning; Anasis Ted
Subject: SDIA Additional Fuel Tanks CEQA NOP Public Comments

Hi SDIA, SDCRAA, and Mr. Ted Anasis:

Thank you for the opportunity to comment on this infrastructure project for the three, 1.15-million gallon, above-ground, 58 feet diameter, and 58 feet high Fuel Tanks.

This email serves as my official public comment. In the future please provide email addresses in the NOP, EIR, and CEQA documents for the public to use. Allow emails, instead of asking only for hardcopies of letters to be mailed or delivered. I do not have a printer.

Please confirm or deny active faulting at the CEQA Stage for the new and expanded Fuel Tanks through valid fault investigations turned into the State Geologist. Although the Airport is not within an Alquist-Priolo (A-P) Earthquake Hazard Zone, active faulting was confirmed at the east side of the Airport property as part of the Rental Car Center. Therefore active faulting through the whole of the Airport footprint on liquefiable soils should be investigated for the first time.

For the last 15 years, the active Fault Investigations and corresponding letters to the State Geologist to update the AP-Maps since 2003 have not been sent in accordance with State law PRC 2697. Please discuss how you will turn in all fault investigations into the State Geologist to update the old 2003 Point Loma Quadrangle AP-Maps, and confirm or deny active faulting in consultation with the State Geologist and SANDAG. Even though the Downtown Special Studies Zone and AP-Maps have Harbor Drive as their Northern Boundary, and stop abruptly at Airport property due to failure to send scientific planning evidence to the State.

Instead of above-ground tanks, unknown foundations, or a foundation on piles, please consider a bathtub structural foundation that gets rid of all liquefiable soil material so the structure can be founded on bedrock @ 30 to 40 feet below grade. So the top of the structures are not 58 feet above current grade. The partially below-grade Tanks would replace liquefiable soils and their foundations would be embedded into competent formational soils.

Bathtub foundations were used for the County Administration Center (CAC) and the Port Headquarters. And are planned for Manchester Pacific Gateway Navy Broadway Complex (NBC), and Seaport Village.

In addition, instead of only concrete containment dike walls between fuel container tanks, please consider using a watertight bulkhead configuration, similar to dry docks.

Regards,

Katheryn Rhodes
371 San Fernando Street
San Diego, California 92106
619-402-8688
laplayaheritage@gmail.com

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DEC 28 2018
BY: .....

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=2697.&highlight=true&keyword=State%20Geologist+copy

http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=2.&title=&part=&chapter=7.8.&article=

Seismic Hazard Mapping 2690-2699.6
Public Resources Code PRC 2697
2697.

(a) Cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. If the city or county finds that no undue hazard of this kind exists, based on information resulting from studies conducted on sites in the immediate vicinity of the project and of similar soil composition to the project site, the geotechnical report may be waived. After a report has been approved or a waiver granted, subsequent geotechnical reports shall not be required, provided that new geologic datum, or data, warranting further investigation is not recorded. Each city and county shall submit one copy of each approved geotechnical report, including the mitigation measures, if any, that are to be taken, to the State Geologist within 30 days of its approval of the report.

-----Original Message-----
From: Huenefeld CIV Carl F <carl.huenefeld@usmc.mil>
Sent: Thursday, January 3, 2019 11:25 AM
To: Anasis Ted <tanasis@san.org>
Subject: FW: Clauses from NFPA 30 wrt Airport Fuel Tanks Project

RECEIVED
JAN 03 2019
BY: .....

Ted, Hope you had a great set of holidays.

Thanks for taking the time to brief us a couple of weeks back.

As discussed we remain a bit uncomfortable with the containment plan - is ability to handle one rupture adequate, when the tanks are so close to each other, and in the middle of a city...

Other concern relates to standoff from the property line. Our non-technical read of the NFPA seems to suggest that the current tanks containment berm is less than 50' from our property line - it might be grandfathered if that is a new standard, but not sure that variance would logically carry over. Are we reading this wrong, doesn't the 50' requirement apply?

r/
Rick

Carl F. Huenefeld II
Colonel, USMC (Ret)
Community Liaison Officer
MCRD, San Diego
619-524-8803

-----Original Message-----
From: Aranha CIV Robert S
Sent: Friday, December 28, 2018 2:10 PM
To: Huenefeld CIV Carl F <carl.huenefeld@usmc.mil>
Subject: Clauses from NFPA 30 wrt Airport Fuel Tanks Project

Good Afternoon Sir,

Per our discussion post meeting at the airport to discuss their upcoming new fuel tanks project, below are the pertinent clauses from National Fire Protection Association (NFPA) 30 reference. Upon reviewing the clauses and reference again as well as drawing out the distances (see attached), I'm not as certain about #2 below, and feel that perhaps we need to obtain a little more info from Ted on the containment system, fuel classes etc. in order to accurately compare with the NFPA 30 clauses/tables.

1) Containment Area Size:

Under heading "24.9 Containment, Drainage, and Spill Control from Storage Tank Buildings."

- 24.9.6* The containment shall have a capacity not less than that of the largest tank that can drain into it.

(Concurs with what was stated at the meeting)

2) Containment Distance from Property Line:

Under heading "9.13* Containment, Drainage, and Spill Control."

- 9.13.1 Storage areas shall be designed and operated to prevent the discharge of liquids to public waterways, public sewers, or adjoining property, unless such discharge has been specifically approved.

(Concurs with what was stated at the meeting, however there are further tables and clauses in the NFPA 30 that specify several distances for structures/containment from the property line. An example is below, which may be the type of containment (primary, secondary?) the airport is
proposing)

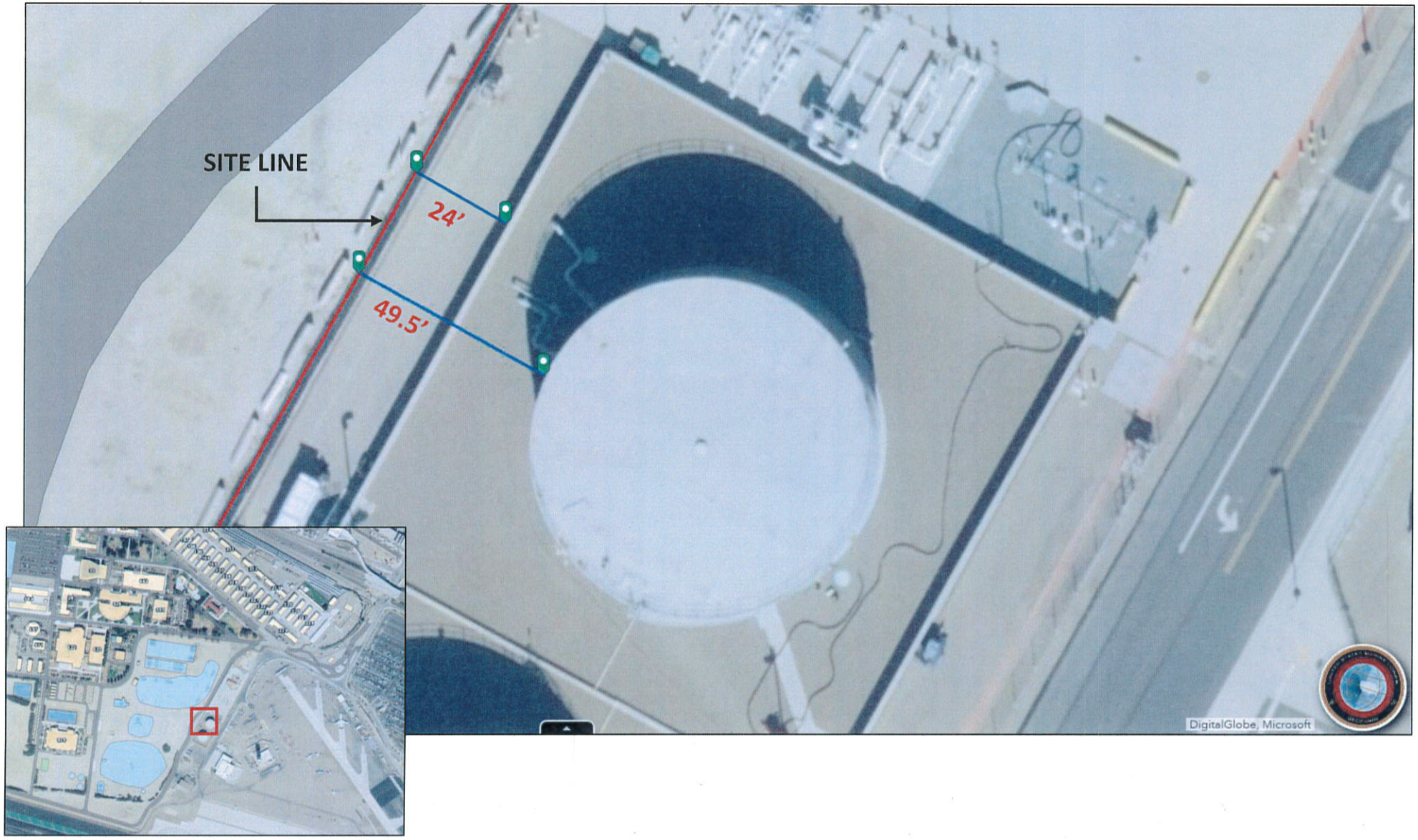
Under heading "22.11* Control of Spills from Aboveground Storage Tanks."

- 22.11.1 Remote Impounding. Where control of spills is provided by drainage to a remote impounding area so that spilled liquid does not collect around tanks, the requirements of
22.11.1.1 through 22.11.1.4 shall apply.

- 22.11.1.4 The impounding area shall be located so that, when filled to capacity, the liquid will not be closer than 50 ft (15 m) from any property line that is or can be built upon or from any tank.

Very Respectfully,
Rob Aranha
Supervisory Community Planner
Marine Corps Recruit Depot
4600 Belleau Ave, BLDG 224
San Diego, CA 92140
P: 619.524.8127
Robert.s.aranha1@usmc.mil

SITE PROXIMITY - JET FUEL TANKS TO MCRD



STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

Edmund G. Brown Jr., Governor

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DEC 07 2018
BY: .....

December 3, 2018

Ted Anasis
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

RE: SCH# SCH# 2018111052 San Diego International Airport- Additional Fuel Tanks, San Diego County

Dear Mr. Anasis:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    - **a.** A brief description of the project.
    - **b.** The lead agency contact information.
    - **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
    - **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
    - **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
    - **a.** Alternatives to the project.
    - **b.** Recommended mitigation measures.
    - **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
    - **a.** Type of environmental review necessary.
    - **b.** Significance of the tribal cultural resources.
    - **c.** Significance of the project's impacts on tribal cultural resources.
    - **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
    - **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
    - **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,

for Nancy Sanchez

Katy Sanchez
Associate Enviromental Planner

cc: State Clearinghouse

From: Larry Hofreiter <lhofreiter@portofsandiego.org>
Sent: Friday, December 21, 2018 3:01 PM
To: Airport Planning; Anasis Ted
Cc: Lesley Nishihira; Jason Giffen
Subject: District Letter to SDCRAA re NOP for Fuel Farm Expansion Project
Attachments: District letter to SDCRAA re NOP for Fuel Farm Expansion Project.PDF

Hi Ted,

Thanks for meeting with us today to discuss the Airport Authority's Draft EIR for the Airport Development Plan (ADP).

As I mentioned earlier today, we received the NOP for the Airport Authority's Fuel Farm Expansion Project, and we are submitting the attached comment letter.

As always, please feel free to contact me if you have any questions.

Have a great holiday and I look forward to ongoing collaboration with you and your team next year!

Sincerely,

Larry Hofreiter, AICP
Program Manager, Planning

3165 Pacific Highway, San Diego, CA 92101
(o) 619.686.6257 • (c) 619.541.0009

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DEC 21 2018
BY: .....

PORT of SAN DIEGO

connect:

Port administration offices are open Monday-Thursday and every other Friday from 8am-5pm.
This email may contain public information and may be viewed by third parties pursuant to the Cal. Public Records Act.

PORT of SAN DIEGO

VIA EMAIL TO: planning@san.org

December 21, 2018

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DEC 21 2018
BY: .....

Mr. Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

RE: San Diego Unified Port District Comments on the Notice of Preparation for a Draft Environmental Impact Report for the San Diego International Airport – Fuel Farm Expansion Project

Dear Mr. Anasis,

The San Diego Unified Port District (District) appreciates the opportunity to provide comments on the Notice of Preparation for a Draft Environmental Impact Report (Draft EIR) for the San Diego International Airport (SDIA) – Fuel Farm Expansion Project. The District was created in 1962 under state legislature titled the "San Diego Unified Port District Act" (Port Act). Under the Port Act, the state's tidelands and submerged lands within San Diego Bay were conveyed to the District to manage and control for the benefit of the people of California. The District has certain fiduciary duties it must exercise in fulfilling its authority and obligations under the Port Act, including, without limitation, the duty to administer the Public Trust solely in the interest of the beneficiaries and public

Although the San Diego County Regional Airport Authority (SDCRAA or Airport Authority) was established by the state legislature in 2001, the District remains the trustee of tidelands upon which SDIA is located and takes its trustee responsibilities very seriously. The District is generally supportive of the Airport Authority's Fuel Farm Expansion Project, and respectfully requests that the Draft EIR address the issues outlined in this letter.

PROJECT DESCRIPTION

As part of the SDIA Fuel Farm Expansion Project, the San Diego County Regional Airport Authority (Airport Authority) proposes to construct three new 1.15-million gallon above-ground fuel storage tanks immediately northeast of the existing jet fuel storage tanks on existing airport property. The purpose of the proposed project is to increase jet fuel storage capacity at SDIA from an approximately two-day supply to an approximately six-day supply, thereby increasing operational reliability and reducing the Airport's dependency on fuel trucking services.

DISTRICT COMMENTS

1. As part of the Project Description, please confirm that the jet fuel will be delivered to the three new above-ground fuel storage tanks via the current Airport Delivery Fuel Line (or Buckeye Pipeline), and that no new pipeline will be needed to convey the jet fuel.
2. As part of the Project Description, please 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.
3. The District is supportive 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 in the tanks.
4. In addition to extending the existing containment area, please have the Draft EIR describe how the fire suppression system will be expanded to address the additional jet fuel being stored on-site.
5. The 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.
6. The Draft EIR's Transportation section should 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.
7. Please note that there is an existing daycare facility located at the adjacent U.S. Marine Corps facility. The Draft EIR should identify the location of this facility and establish appropriate safeguards to ensure that the proposed project will not result in adverse effects on this nearby facility.
8. Please note that the proposed location of the three new jet fuel storage tanks are in the vicinity of an old fire fighting test pit, and that there may be some contamination in the area.
9. The new fuel storage tanks have the potential to be predator perches. Please have the Draft EIR address how the fuel storage tanks can be modified, and/or other practices that can be employed, to reduce the likelihood of additional predator perching.
10. Please have the Draft EIR evaluate impacts to Least Terns during construction activities.
11. Please be sure to 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 to you via email on September 7, 2017, for any cumulative project analysis that needs to be performed. The District will provide you with any updated development ranges for these three planning district's, as the PMPU progresses in 2019. The extent to which the Airport Authority's Draft EIR for the Fuel Farm Expansion Project is able to incorporate any updated information from the District's PMPU would be much appreciated.

Thank you again for the opportunity to provide comments on the Notice of Preparation for the SDIA Fuel Farm Expansion Project. Please contact me at (619) 686-6469 or lnishihi@portofsandiego.org with any questions regarding the information detailed above.

Sincerely,

Lesley Nishihira
Director, Planning Department
Planning and Green Port

Cc:
Jason Giffen, Assistant Vice President, Planning and Green Port
Larry Hofreiter, Program Manager, Planning Department

VIEJAS
TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 619.445.3810
Fax: 619.445.5337
viejas.com

January 28, 2019

Ted Anasis, Manager
San Diego Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138

RE: Additional Fuel Tanks

Dear Mr. Anasis,

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314 or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov , for scheduling. Thank you.

Sincerely,

Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

RECEIVED
JAN 31 2019
BY: .....

FEDERAL AGENCIES

-----Original Message-----
From: Huenefeld CIV Carl F <carl.huenefeld@usmc.mil>
Sent: Thursday, January 3, 2019 11:25 AM
To: Anasis Ted <tanasis@san.org>
Subject: FW: Clauses from NFPA 30 wrt Airport Fuel Tanks Project

RECEIVED
JAN 03 2019
BY: .....

Ted, Hope you had a great set of holidays.

Thanks for taking the time to brief us a couple of weeks back.

As discussed we remain a bit uncomfortable with the containment plan - is ability to handle one rupture adequate, when the tanks are so close to each other, and in the middle of a city...

Other concern relates to standoff from the property line. Our non-technical read of the NFPA seems to suggest that the current tanks containment berm is less than 50' from our property line - it might be grandfathered if that is a new standard, but not sure that variance would logically carry over. Are we reading this wrong, doesn't the 50' requirement apply?

r/
Rick

Carl F. Huenefeld II
Colonel, USMC (Ret)
Community Liaison Officer
MCRD, San Diego
619-524-8803

-----Original Message-----
From: Aranha CIV Robert S
Sent: Friday, December 28, 2018 2:10 PM
To: Huenefeld CIV Carl F <carl.huenefeld@usmc.mil>
Subject: Clauses from NFPA 30 wrt Airport Fuel Tanks Project

Good Afternoon Sir,

Per our discussion post meeting at the airport to discuss their upcoming new fuel tanks project, below are the pertinent clauses from National Fire Protection Association (NFPA) 30 reference. Upon reviewing the clauses and reference again as well as drawing out the distances (see attached), I'm not as certain about #2 below, and feel that perhaps we need to obtain a little more info from Ted on the containment system, fuel classes etc. in order to accurately compare with the NFPA 30 clauses/tables.

1) Containment Area Size:

Under heading "24.9 Containment, Drainage, and Spill Control from Storage Tank Buildings."

- 24.9.6* The containment shall have a capacity not less than that of the largest tank that can drain into it.

(Concurs with what was stated at the meeting)

2) Containment Distance from Property Line:

Under heading "9.13* Containment, Drainage, and Spill Control."

- 9.13.1 Storage areas shall be designed and operated to prevent the discharge of liquids to public waterways, public sewers, or adjoining property, unless such discharge has been specifically approved.

(Concurs with what was stated at the meeting, however there are further tables and clauses in the NFPA 30 that specify several distances for structures/containment from the property line. An example is below, which may be the type of containment (primary, secondary?) the airport is
proposing)

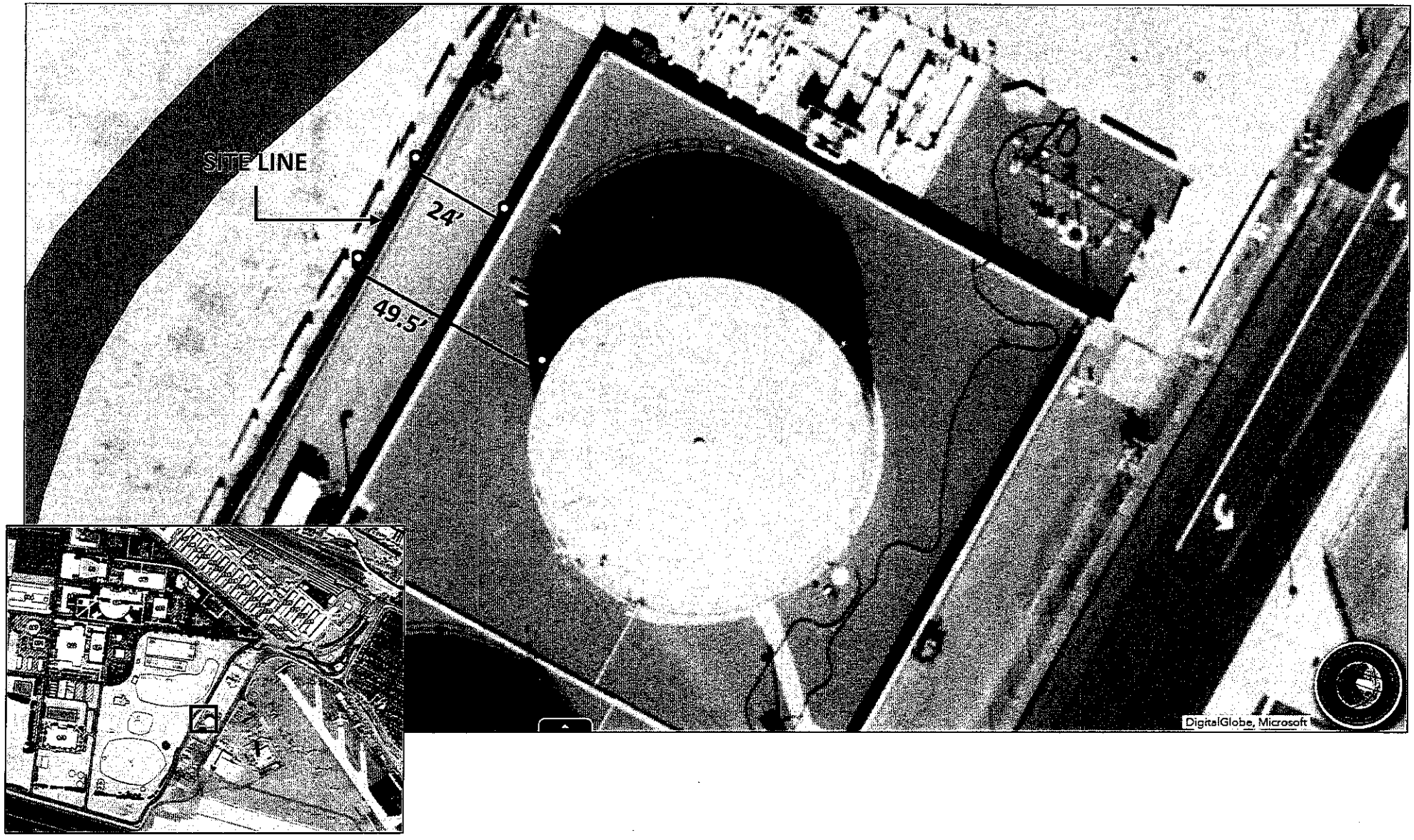
Under heading "22.11* Control of Spills from Aboveground Storage Tanks."

- 22.11.1 Remote Impounding. Where control of spills is provided by drainage to a remote impounding area so that spilled liquid does not collect around tanks, the requirements of
22.11.1.1 through 22.11.1.4 shall apply.

- 22.11.1.4 The impounding area shall be located so that, when filled to capacity, the liquid will not be closer than 50 ft (15 m) from any property line that is or can be built upon or from any tank.

Very Respectfully,
Rob Aranha
Supervisory Community Planner
Marine Corps Recruit Depot
4600 Belleau Ave, BLDG 224
San Diego, CA 92140
P: 619.524.8127
Robert.s.aranha1@usmc.mil

SITE PROXIMITY - JET FUEL TANKS TO MCRD



STATE AGENCIES

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

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DEC 07 2018
BY: .....

December 3, 2018

Ted Anasis
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

RE: SCH# SCH# 2018111052 San Diego International Airport- Additional Fuel Tanks, San Diego County

Dear Mr. Anasis:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    a. A brief description of the project.
    b. The lead agency contact information.
    c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
    d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
    a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
    a. Alternatives to the project.
    b. Recommended mitigation measures.
    c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
    a. Type of environmental review necessary.
    b. Significance of the tribal cultural resources.
    c. Significance of the project's impacts on tribal cultural resources.
    d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
    a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
    b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,

for

Katy Sanchez
Associate Enviromental Planner

cc: State Clearinghouse

LOCAL AGENCIES

From: Misleh, John <John.Misleh@sdcounty.ca.gov>
Sent: Friday, December 21, 2018 9:54 AM
To: Airport Planning
Cc: Hines, Colleen; Rapista, Robert; Bennett, Mary; Preece, Sharon; Pence, Sande
Subject: 11/28/18 Notice: Fuel Farm Expansion Project at SDIA, Draft EIR Comments
Attachments: SDIA Proposed Fuel Farm Expansion Public Notice.pdf

Ted Anasis, Manager, Airport Planning
San Diego International Airport (SDIA)
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

Dear Mr. Anasis,

Attached are the comments for this project from the County of San Diego, Hazardous Materials Division.

John Misleh, Program Coordinator
County of San Diego
Department of Environmental Health
Hazardous Materials Division
858-495-5672
http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html

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DEC 21 2018
BY: .....

County of San Diego

ELISE ROTHSCHILD
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
Phone: (858) 505-6700 or (800) 253-9933 Fax: (858) 505-6786
www.sdcdeh.org

AMY HARBERT
ASSISTANT DIRECTOR

December 20, 2018

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BY: .....

Ted Anasis, Manager, Airport Planning
San Diego International Airport (SDIA)
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

Sent via e-mail to: planning@san.org

COMMENTS: 11/28/18 Notice: Fuel Farm Expansion Project at SDIA, Draft EIR Preparation

Dear Mr. Anasis:

Thank you for the opportunity to comment on the referenced project. The County of San Diego Hazardous Materials Division (HMD) is responsible for the protection of public health and the environment by ensuring hazardous materials, hazardous waste, medical waste and underground storage tanks are properly managed. The HMD has completed their review and has the following comments regarding the project.

The proposed project would include the following components as stated in the Notice:
The Fuel Farm Expansion Project (the Proposed Project) at SDIA, comprises three 1.15-million gallon above-ground fuel storage tanks, each with a usable storage volume of approximately 966,000 gallons; concrete containment dike walls; accessory piping, pipe supports and foundations; concrete equipment pads; steel platforms and stairs; extension and modifications to the existing fire suppression system; and an associated underground drainage system. The three proposed new tanks would be constructed immediately northeast of the existing jet fuel storage tanks on existing Airport property, and would be approximately 58 feet in diameter and 58 feet tall. Demolition, grading, and ground improvements in the area to prepare for the construction will be conducted. The potential significant environmental effects of the Proposed Project are anticipated to be related to aesthetics (visual), biological (coastal) resources, hazards and hazardous materials, and cumulative effects.

Please be advised, any and all construction-related hazardous waste (examples: used oil, paint waste, lead paint debris, etc.) generated onsite must be properly classified, labeled and handled in manner to prevent release to the environment. In addition, SDIA and/or contractor(s) must ensure

hazardous waste generated during all project work is properly classified, labeled and disposed by a California registered hazardous waste hauler. Unified Program Facility Permit may also be required for the accumulation and storage of these wastes. More information is found at this webpage: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazwaste.html

COMMENTS:

1. According to the project description in the document, an increase in hazardous materials will handled/stored at the facility requiring a revised hazardous materials business plan submittal to the HMD in CERS. The facility operator is required to submit a Hazardous Materials Questionnaire to the HMD and complete a HMD Hazardous Materials Plan Check review prior to issuance of a certificate of occupancy by a Building Department. For your reference, information regarding the plan check requirement can be reviewed at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html

2. Please be advised, any proposed activities during construction and after completion of the Fuel Farm Expansion Project involving hazardous materials or generating hazardous waste will require the operator(s) to update the facility's Unified Program Facility Permit through the California Environmental Reporting System (CERS) and comply with local/state laws, and regulations. Webpage for CERS: https://cers.calepa.ca.gov/

3. The three (3) new above-ground fuel storage tanks under the proposed project would require a revised Spill Prevention Control and Countermeasures Plan (SPCC) and demonstrate compliance with the Aboveground Petroleum Storage Act, Cal. Health and Safety Code, sections 25270 etc. The operator shall complete the SPCC plan and retain a copy onsite for inspection by the HMD. Also, if a fueling rack or a fuel recovery tank is constructed, the SPCC regulations for the aboveground containers, piping, and tanks are applicable and should be addressed.

4. Please note, anytime during construction and after completion of the Fuel Farm Expansion Project, the HMD has the authority pursuant to state law and County Code to regulate facilities that handle or store hazardous materials, and/or generate or treat hazardous waste. The HMD will apply that authority as necessary to protect public health and the environment. Additional regulatory guidance information can be found on our website at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat.html.

5. If soil and/or groundwater contamination containing a hazardous substance is discovered or encountered during excavation, construction, or grading activity, SDIA shall investigate the contamination and report the release to the HMD and applicable State/federal agency. Some environmental assessment and/or remediation work may involve several regulatory oversight agencies. If a release of hazardous waste is discovered as part of this project, timely reporting of the release in writing to the County and State oversight agencies may be required pursuant to State laws. Webpages for more information: https://www.dtsc.ca.gov/SiteCleanup/Brownfields/upload/SB-2057.pdf and https://www.waterboards.ca.gov/sandiego/water_issues/programs/smc/scp.html

6. If an underground storage tank (UST) is unexpectedly discovered during site work which previously held a hazardous substance, SDIA shall apply for a UST removal permit in accordance with State law before removing the tank and connected piping. Information about the permitting process and laws is found at: https://www.sandiegocounty.gov/deh/hazmat/ust/hmd_ust_construction.html

7. If SDIA is planning for this project on installing a UST system or underground sump/vault to collect and/or store a hazardous substance, a UST installation permit may be required by State law and County ordinance before construction of the system. Information about the permitting process and laws is found at the weblink listed in #6 above.

   Please be advised, underground piping associated with an airport hydrant system (AHS) and connected to above-ground fuel storage tanks may be regulated as an underground storage tank (UST) system. If 10 percent or more of the total storage capacity is underground, then the AHS meets the definition of a regulated UST system. The calculation must include all aboveground and underground tanks storing aircraft fuel and all underground piping. More information on regulating AHS including examples to assist in performing the calculation is found at: https://www.epa.gov/sites/production/files/2017-10/documents/fct-ahs-10-4-17-final508.pdf If a fueling rack with a fuel recovery, fuel drainage/collection tank, or spill tank is installed underground, the State UST regulations for underground tank systems may be applicable and should be addressed.

8. If SDIA will be installing an unburied tank system in an underground area/structure or in a vault as part of the project, there are new regulations and laws for these systems. Information can be found at: http://osfm.fire.ca.gov/cupa/pdf/TIUGA-Laws-n-Regs_04Apr2018.pdf

The HMD appreciates the opportunity to participate in the environmental review process for this project. If you have any questions regarding these comments, please contact Robert Rapista at (858) 505-6818 or by e-mail at robert.rapista@sdcounty.ca.gov

Sincerely,

Dec 21 2018 10:54 AM

X Misleh, John

Misleh, John

cosign

John Misleh, Program Coordinator
Hazardous Materials Division

Email Ecc: Mary Bennett, DEH
Robert Rapista, DEH-HMD

Sharon Preece, HMD
Colleen Hines, LWQD-DEH
DEH file record: DEH2002-HUPFP-201141

From: Larry Hofreiter <lhofreiter@portofsandiego.org>
Sent: Friday, December 21, 2018 3:01 PM
To: Airport Planning; Anasis Ted
Cc: Lesley Nishihira; Jason Giffen
Subject: District Letter to SDCRAA re NOP for Fuel Farm Expansion Project
Attachments: District letter to SDCRAA re NOP for Fuel Farm Expansion Project.PDF

Hi Ted,

Thanks for meeting with us today to discuss the Airport Authority's Draft EIR for the Airport Development Plan (ADP).

As I mentioned earlier today, we received the NOP for the Airport Authority's Fuel Farm Expansion Project, and we are submitting the attached comment letter.

As always, please feel free to contact me if you have any questions.

Have a great holiday and I look forward to ongoing collaboration with you and your team next year!

Sincerely,

Larry Hofreiter, AICP
Program Manager, Planning

3165 Pacific Highway, San Diego, CA 92101
(o) 619.686.6257 • (c) 619.541.0009

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DEC 21 2018
BY: .....

PORT of SAN DIEGO

connect:

Port administration offices are open Monday-Thursday and every other Friday from 8am-5pm.
This email may contain public information and may be viewed by third parties pursuant to the Cal. Public Records Act.

PORT of SAN DIEGO

VIA EMAIL TO: planning@san.org

December 21, 2018

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DEC 21 2018
BY: .....

Mr. Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

RE: San Diego Unified Port District Comments on the Notice of Preparation for a Draft Environmental Impact Report for the San Diego International Airport – Fuel Farm Expansion Project

Dear Mr. Anasis,

The San Diego Unified Port District (District) appreciates the opportunity to provide comments on the Notice of Preparation for a Draft Environmental Impact Report (Draft EIR) for the San Diego International Airport (SDIA) – Fuel Farm Expansion Project. The District was created in 1962 under state legislature titled the "San Diego Unified Port District Act" (Port Act). Under the Port Act, the state's tidelands and submerged lands within San Diego Bay were conveyed to the District to manage and control for the benefit of the people of California. The District has certain fiduciary duties it must exercise in fulfilling its authority and obligations under the Port Act, including, without limitation, the duty to administer the Public Trust solely in the interest of the beneficiaries and public

Although the San Diego County Regional Airport Authority (SDCRAA or Airport Authority) was established by the state legislature in 2001, the District remains the trustee of tidelands upon which SDIA is located and takes its trustee responsibilities very seriously. The District is generally supportive of the Airport Authority's Fuel Farm Expansion Project, and respectfully requests that the Draft EIR address the issues outlined in this letter.

PROJECT DESCRIPTION

As part of the SDIA Fuel Farm Expansion Project, the San Diego County Regional Airport Authority (Airport Authority) proposes to construct three new 1.15-million gallon above-ground fuel storage tanks immediately northeast of the existing jet fuel storage tanks on existing airport property. The purpose of the proposed project is to increase jet fuel storage capacity at SDIA from an approximately two-day supply to an approximately six-day supply, thereby increasing operational reliability and reducing the Airport's dependency on fuel trucking services.

DISTRICT COMMENTS

1. As part of the Project Description, please confirm that the jet fuel will be delivered to the three new above-ground fuel storage tanks via the current Airport Delivery Fuel Line (or Buckeye Pipeline), and that no new pipeline will be needed to convey the jet fuel.
2. As part of the Project Description, please 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.
3. The District is supportive 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 in the tanks.
4. In addition to extending the existing containment area, please have the Draft EIR describe how the fire suppression system will be expanded to address the additional jet fuel being stored on-site.
5. The 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.
6. The Draft EIR's Transportation section should 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.
7. Please note that there is an existing daycare facility located at the adjacent U.S. Marine Corps facility. The Draft EIR should identify the location of this facility and establish appropriate safeguards to ensure that the proposed project will not result in adverse effects on this nearby facility.
8. Please note that the proposed location of the three new jet fuel storage tanks are in the vicinity of an old fire fighting test pit, and that there may be some contamination in the area.
9. The new fuel storage tanks have the potential to be predator perches. Please have the Draft EIR address how the fuel storage tanks can be modified, and/or other practices that can be employed, to reduce the likelihood of additional predator perching.
10. Please have the Draft EIR evaluate impacts to Least Terns during construction activities.
11. Please be sure to 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 to you via email on September 7, 2017, for any cumulative project analysis that needs to be performed. The District will provide you with any updated development ranges for these three planning district's, as the PMPU progresses in 2019. The extent to which the Airport Authority's Draft EIR for the Fuel Farm Expansion Project is able to incorporate any updated information from the District's PMPU would be much appreciated.

Thank you again for the opportunity to provide comments on the Notice of Preparation for the SDIA Fuel Farm Expansion Project. Please contact me at (619) 686-6469 or lnishihi@portofsandiego.org with any questions regarding the information detailed above.

Sincerely,

Lesley Nishihira
Director, Planning Department
Planning and Green Port

Cc:
Jason Giffen, Assistant Vice President, Planning and Green Port
Larry Hofreiter, Program Manager, Planning Department

From: Pascual, Elena <EPascual@sandiego.gov>
Sent: Friday, December 21, 2018 5:05 PM
To: Airport Planning
Cc: Hansen, Mike; Muto, Alyssa; Vonblum, Heidi; Malone, Rebecca; Stephens, Mark; Cedeno, Meghan; Gonsalves, Ann; Morrison, Susan
Subject: City of San Diego Comment Letter on the Notice of Preparation for the San Diego International Airport Fuel Farm Expansion Project
Attachments: Final City of San Diego Comment Letter on the NOP for the SDIA Fuel Farm Expansion Project.pdf

Dear Mr. Anasis:

Thank you for the opportunity to review the Notice of Preparation for the San Diego International Airport Fuel Farm Expansion Project. Please see the attached City of San Diego comment letter on the NOP. Please let us know if you have any questions.

Thank you,
Elena

Elena Pascual
Environmental Planner
City of San Diego
Planning Department

T: 619-533-5928
EPascual@sandiego.gov

CONFIDENTIAL COMMUNICATION
This electronic mail message and any attachments are intended only for the use of the addressee(s) named above and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not an intended recipient, or the employee or agent responsible for delivering this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this e-mail message in error, please immediately notify the sender by replying to this message or by telephone. Thank you.

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The City of
SAN DIEGO
Planning Department

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DEC 21 2018
BY: .....

December 21, 2018

Ted Anasis, Manager, Airport Planning
San Diego County Regional Airport Authority
3225 N. Harbor Drive
San Diego, CA 92101

Subject: **CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT FOCUSED ENVIRONMENTAL IMPACT REPORT FOR THE SAN DIEGO INTERNATIONAL AIRPORT FUEL FARM EXPANSION PROJECT**

Dear Mr. Anasis:

The City of San Diego ("City") Planning Department has received the Notice of Preparation (NOP) prepared by the San Diego County Regional Airport Authority (SDCRAA) and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the NOP and appreciates this opportunity to provide comments to the SDCRAA. The City looks forward to continued coordination with the SDCRAA and other local, regional, state, and federal agencies. In response to this request for public comments, the City has the following comments on the NOP for your consideration.

• • •

TRANSPORTATION & STORM WATER DEPARTMENT – MARK G. STEPHENS, ASSOCIATE PLANNER – MGStephens@sandiego.gov, 858-541-4361

The Storm Water Division leads the City's efforts to protect and improve water quality of rivers, creeks, bays, and the ocean, and is generally responsible for inspection, operation, maintenance, and repair of storm drain systems in the public right-of-way and drainage easements. Thus, aspects of project development, operation, and maintenance that could affect water quality or the storm drain system are of priority interest.

1. The Notice of Preparation (NOP) of a Draft Focused Environmental Impact Report (EIR) and the Notice of Availability issued by the San Diego County Regional Airport Authority describe the three proposed new tanks as being constructed immediately northeast of the existing jet fuel storage tanks on existing Airport property. This appears inconsistent with the southwest location of the two existing above ground tanks shown on NOP Exhibit 1, Project Location.

DEVELOPMENT SERVICES DEPARTMENT – MEGHAN CEDEÑO, ASSOCIATE TRAFFIC ENGINEER – MCedeno@sandiego.gov, 619-446-5357

1. Any Transportation Impact Analysis in the DEIR should follow the guidelines of the City of San Diego Traffic Impact Study Manual, July 1998, and should apply the City of San Diego CEQA Significance Determination Thresholds, July 2016, for all transportation facilities within the City of San Diego evaluated.

2. The DEIR should include a discussion and potentially an analysis of any construction traffic impacts of the proposed project.

• • •

Thank you for the opportunity to provide comments on the NOP. Please contact me directly if there are any questions regarding the contents of this letter or if the SDCRAA would like to meet with City staff to discuss our comments. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at RMalone@sandiego.gov or by phone at 619-446-5371.

Sincerely,

Heidi Vonblum, Program Manager
Planning Department

RM/ep

cc: Reviewing Departments (via email)
Review and Comment online file

ORGANIZATIONS

(None)

COMMUNITY PLANNING GROUPS

(None)

INDIVIDUALS

From: gillian ackland <acklandgm@hotmail.com>
Sent: Wednesday, December 19, 2018 11:51 AM
To: Airport Planning
Subject: Fuel tank Draft EIR

795 Bellevue Place

La Jolla, CA 92037

12/19/18

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BY: .....

SDCRAA Attn: Ted Anasis

Ref: Draft EIR for additional fuel tanks

The airport at Lindbergh field is blighting the city with noise and pollution. The proposed projects has significant impacts to the aesthetics , biological (coastal) resources, hazards and hazardous materials and cumulative effects which are not adequately defined or avoided in the project.

This project will only increase the already adverse effects on the city, the people and the environment in which we live and is therefore not in the best interests of the residents and should be rejected.

I strongly object to the predicted proposal

Gillian Ackland

WORLDWIDE ENGINEERING SERVICES COMPANY

WESCO

JAMES GILHOOLY
President

ENGINEERING • INSPECTION • EVALUATION • TRANSPORTATION

3451 TRUMBULL ST • SAN DIEGO CA 92106
TEL 1 619-223-9768 • FAX 1 619-223-8939

WORLDWIDE ENGINEERING SERVICES COMPANY

WESCO

JAMES GILHOOLY
Presidente

INGENIERA • INSPECCIÓN • EVALUACIÓN • TRANSPORTACIÓN

PLAYAS DE ROSARITO • BAJA CA
FROM US 1 619-223-9768 • FAX 1 619 223-8939

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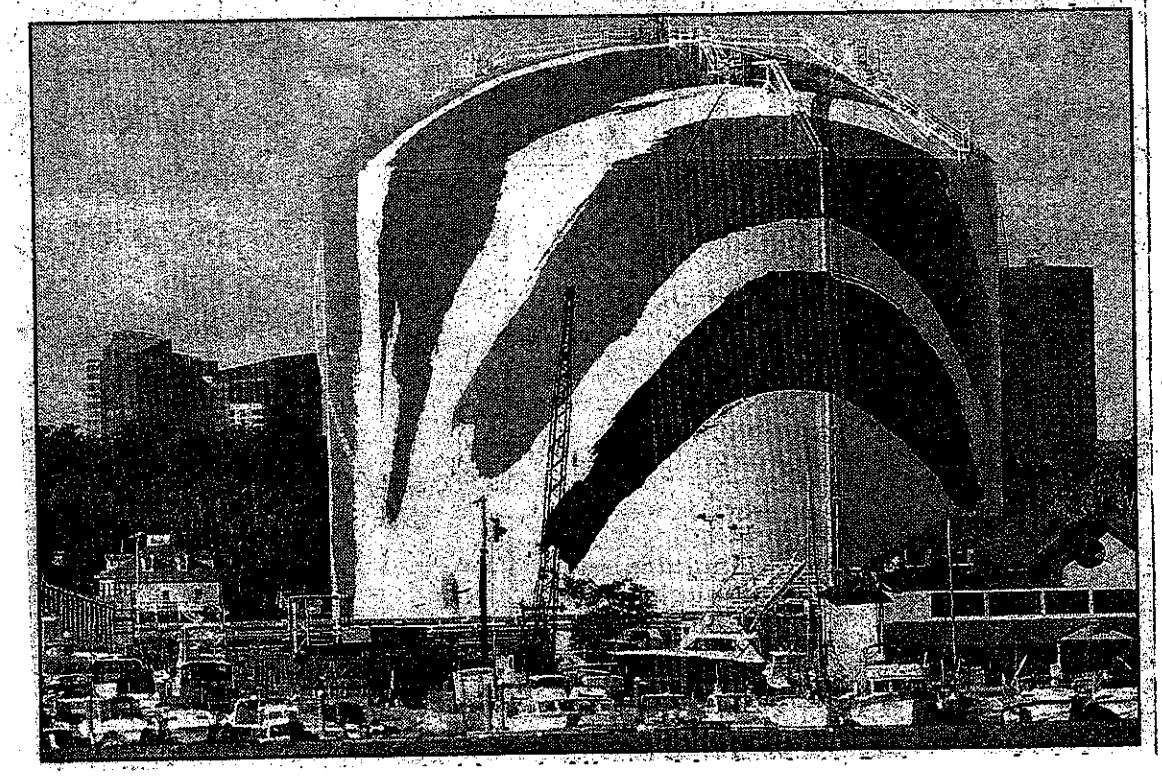
BY: .....

TYPICAL OIL STORAGE TANK

THREE
58' 0"
DIAMETER
X
58' X 0" TALL
TANKS

THINK
MODULARIZATION
?



NOTE

CONVENTIONAL (STICK-BUILT)(FIELD)(ERECTION
INVOLVES MULTIPLE STACKED COURSES
A ROOF (MULTIPLE SECTIONED PLATES)
A BASE (MULTIPLE SECTION PLATES)

FIELD WELDING ON TANKS THIS SIZE CONSUME
SOME 9000 LBS OF ELECTRODES USING SMAW-SAW AND
FLUX-CORED WELDING
PROCEDURES

LINDBERGH AIRPORT
PROJECT

FUEL TANK FARM EXPANSION

ADDITION OF THREE(3) FUEL TANKS AND EXPANSION OF CONCRETE FOUNDATION AND RINGWALLS TO ACCOMMODATE RELIABLE JET FUEL SUPPLY FOR AIRCRAFT OPERATING AT S.D.I.A.

QUESTIONS

1) WHAT IS THE LOCATION OF NEW FUEL FACILITY TO POPULATION CENTERS, PASSENGER TERMINALS, ETC., ETC.
2) IS THE NEW FUEL FARM IN A "EXCLUSION ZONE" TO ISOLATE FUEL LEAKS FROM GENERAL PUBLIC & PROPERTY
(3) HAS A BUFFER ZONE BEEN SET UP.
(4) ACTUAL DISTANCES FROM PROPERTY LINES.
(5) ARE STANDARDS, PREVENTATIVE MEASURES USED TO PROTECT CONSTRUCTION PERSONNEL, GENERAL PUBLIC, PASSENGERS FROM LEAKS EXPLOSIONS, FIRE, NOISE AND THE EFFECTS OF NATURAL PHENOMENA.
(6) HAVE BUILDING LAND USE, DEVELOPMENT AND ENVIRONMENTAL PERMITS BEEN GRANTED FOR FUEL FARM.
7) WAS THE SAFETY OF GENERAL PUBLIC ADDRESSED IN PERMIT DISCUSSIONS
8) IS DESIGN IN ACCORDANCE, NFPA - NFC. - API

IF FOREIGN STEEL IS UTILIZED ON U.S. PROJECTS MAKE SURE CONTRACTOR PASSES ON DISCOUNT PRICE! 5

WESCO
WORLDWIDE ENGINEERING SERVICES COMPANY

James Gilhooly

3451 TRUMBULL STREET
SAN DIEGO CA 92106
TEL (619) 223-9768
FAX (619) 223-8939

SUBJECT: Utilization of Chinese Steel Materials for Global - International Boiler Contracts. TANK

Thousands of Boilers produce steam for heating, power generation in the People's Republic of China.

All of the ASME/ASTM materials (Plates, Pipes, Tubes, Etc.,) for these boilers were designed and manufactured from Chinese domestic sources.

All of the personnel in the [redacted]. boiler facilities are very experienced in the design, engineering, manufacturing and construction of these domestic materials.

With a view to utilizing Chinese materials in boilers and equipment for the Global and International markets I would recommend that a comparison of Chinese steel material properties, (chemical - Physical - Mechanical, etc.,) and operational experience be made, and documented against foreign codes and specifications such as ASME - DIN - JIS -, etc. If the properties of the Chinese steel materials are compatible to the other Global market steel materials. All boiler steel for export/Global equipment contracts could be sourced in China, resulting in cost and schedule savings which may give S.B.W. the competitive edge in the Global markets as well as increasing jobs in China for domestic craftsmen.

James Gilhooly
President

MATERIAL ?
STEEL ?

THE CHINESE/KOREAN MILLS HAVE FLOODED GLOBAL MARKETS WITH QUESTIONABLE CHEAP STEEL MATERIAL.

CHECK, ENSURE CHEMICAL/PHYSICAL, MECHANICAL DOCUMENTATION IS SUPPLIED.

PROJECT

FUEL TANK FARM EXPANSION CONT'D

9) NFPA (NATIONAL FIRE PROTECTION ASSOC)
N.F.C (NATIONAL FIRE CODE)
OSHA (DEPT. OCCUPATIONAL SAFETY/HEALTH

10) HAS AN ENVIRONMENTAL IMPACT REPORT STATEMENT ON INTIAL FUEL FARM BEEN COMPLETED ?

3.

GREG.

F.Y.I.

SPECIAL REPORT
WELDING FUMES

WELDING FUMES SPARK CONTROVERSY

Toxic-substance legislation tightens standards for employee exposure and emissions. Manufacturers must identify hazards and keep workplace-air quality within OSHA limits. Ventilation is key to keeping exposures low.

WESCO

AIR POLLUTION

Sources of Air Pollution

Stationary Combustion

Industrial, commercial, and household sources; including power plants, manufacturing plants, open burning dumps, home fireplaces and furnaces, incinerators, agricultural and forest waste disposal. Includes natural sources such as volcanoes, forest fires, etc.

Mobile Combustion

Confined to transportation industry and includes autos, trains, aircraft, ships, buses, which normally utilize internal combustion, steam-driven, or gas turbine engines. Also includes natural sources such as dust storms, electrical storms, etc.

Types of Air Pollutants

Gases and Vapors

Small size particles normally make these air pollutants difficult to remove. Methods include absorption, adsorption or incineration. Common polluting gases include sulfur dioxide and trioxide, hydrogen chloride, chlorine, and oxides of nitrogen. Vapors include hydrocarbons, trace metals, fluorine, and others.

Liquid Particulates

Easy to remove in above-3 micron size; below 3 microns and in sub-micron sizes, special equipment is required to remove particulates, normally at higher cost. Special problems can occur when liquids are highly flammable or corrosive. Common examples include sulfuric acids and other acids, organic compounds, and even water in some cases.

Solid Particulates

Same degrees of difficulty exist with solid particulates as with liquids, related to micron size. Soluble solids can be removed by adding water to dissolve and cause them to drain from filter mechanisms. Insoluble solids require other forms of control. Examples are fly ash, products of incomplete combustion, dust, chemical compounds, and minerals.

Odors

Odors are normally in gas or vapor forms. They cause irritation and undesirable reactions when perceived by the olfactory sensors. Common sources are chemical plants, paper mills, stockyards, slaughterhouses, and some food processing operations.

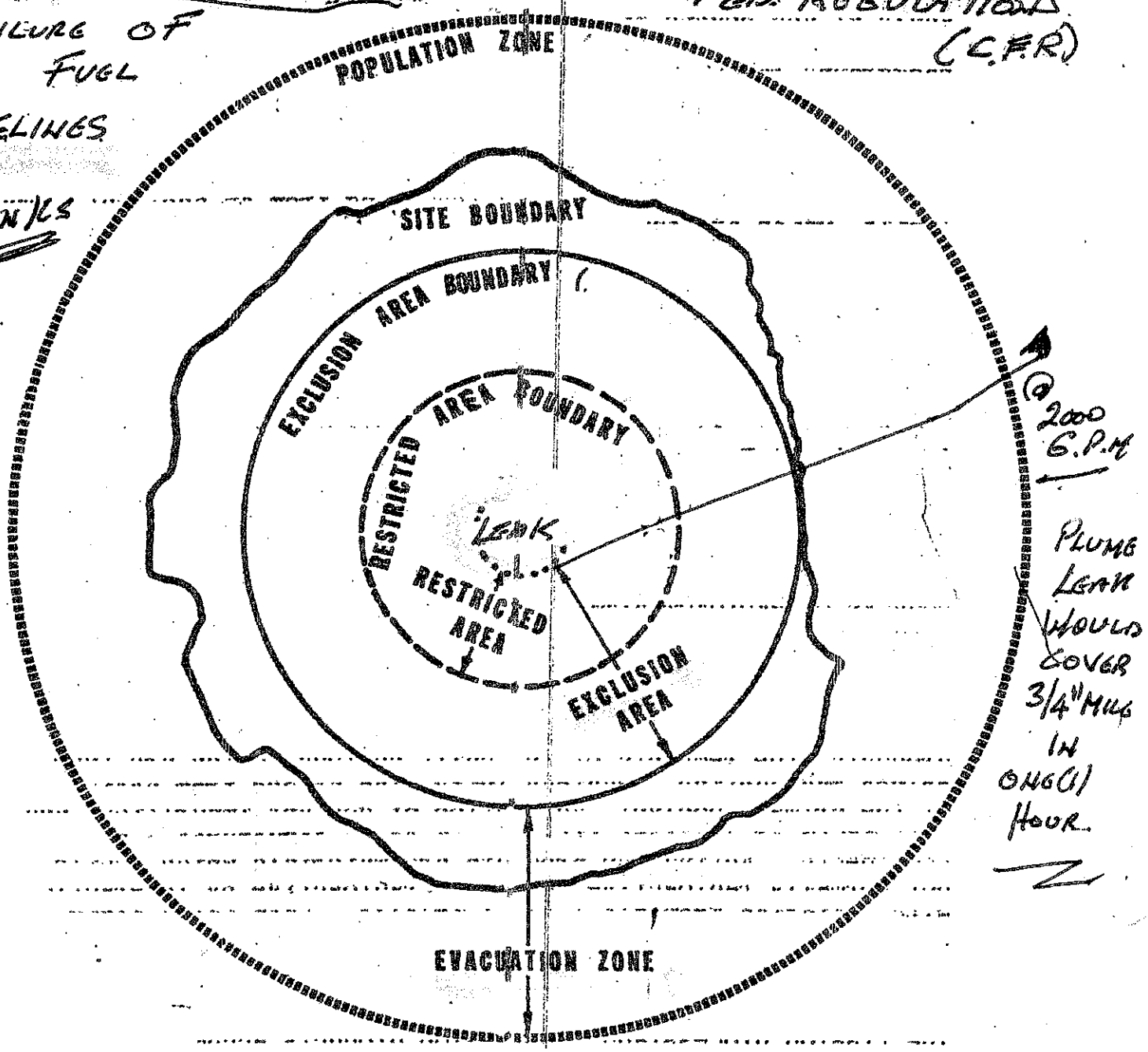
AIR POLLUTION BECAME A MAJOR ISSUE ON NAVY POINT LOMA PROJECT.

(FIELD WELDING, SANDBLASTING ETC. OF NEW FUEL TANK FACILITY ___ ?

EXCLUSION MAP

FAILURE OF FUEL PIPELINES TANKS

FED. REGULATIONS (C.F.R)



NOTE: IN SOME CASES, THE RESTRICTED AREA BOUNDARY, THE EXCLUSION AREA BOUNDARY AND THE SITE BOUNDARY MAY BE CONTIGUOUS.

QUESTION: ARE SPECIAL SAFEGUARD SYSTEMS & SAFETY FEATURES BUILT INTO THE DESIGN OF FUEL STORAGE TANKS → TO PROTECT PUBLIC ?

CONCEPTUAL BOUNDARIES

SAN DIEGO INTERNATIONAL AIRPORT

SUBJECT: FIELD WELDING OF NEW FUEL OIL TANKS, PIPING, VALVES.

REF. WELDING FUMES (AIR CONTAMINANTS
29 CFR
S.A.R.A TITLE III

WELDING FUMES ON SUBJECT PROJECT WILL BE A CONTROVERSIAL TOPIC AND A MAJOR CONCERN OF S.D.I.A. BASED ON THE AMOUNT OF STICK BUILT WELDING PROPOSED IN THE ERECTION OF TANKS, PIPING & VALVES.
S.D.I.A & ITS CONTRACTORS MUST IDENTIFY HAZARDS ASSOCIATED WITH WELDING, DEVELOP AND MAINTAIN WORK PRACTICES WITHIN OSHA LIMITS TO PROTECT THE WORKERS, PUBLIC, PUBLIC AREAS UNDER CURRENT TOXIC SUBSTANCE LEGISLATION.
THIS IS JUST ANOTHER REASON WHY S.D.I.A SHOULD CONSIDER THE MODULAR APPROACH IN FACTORY/SHOP MANUFACTURE OF THESE LARGE FUEL TANKS.

Jim Gilhooly

MODULARIZATION

FACT

EQUIPMENT COSTS HAVE RISEN 68%
SINCE YEAR —— 2017

MODULARIZATION

THE TERM MODULARIZATION IS USED TO DEFINE A SERIOUS OF CONSTRUCTION TECHNIQUES, THAT HAVE THE POTENTIAL FOR LOWERING OVERALL PROJECT COSTS TRAFFIC CONJESTION, ENVIRONMENTAL PROBLEMS ON PROPOSED NEW TANK FARMS COMPARED TO

CONVENTIONAL STICK BUILT TANK FARMS

MODULAR DESIGN AND CONSTRUCTION TECHNIQUES DEVELOPED FOR OFFSHORE AND ALASKA HAVE BEEN APPLIED TO NUMEROUS APPLICATIONS THROUGHOUT THE UNITED STATES WITH GREAT RESULTS.

STUDIES HAVE ESTABLISHED THAT MODULAR DESIGN & SHOP ASSEMBLY CONCEPTS HAVE IMPROVED OVERALL CONST. SCHEDULES, REDUCED LABOR HOURS, IMPROVED ENVIRONMENTAL CONDITIONS.

Jim Galloway

COST SAVINGS FROM MODULARIZATION

WESCO

SINGLE STANDPIPE TANK PROJECT # 285129
COST SAVINGS FROM MODULARZATION

(% Of Stick-Built Cost)

Item	Cost Effect	
	Savings	Added Cost
Craft wage rates and overheads	3.0%	
Better labor efficiency at preassembly yard (SHOP)	6.0%	
Better labor efficiency at field construction site	0.8%	
More bulk materials are required		0.3%
Home office costs increase		0.9%
Additional module handling and transportation costs		1.3%
Total Cost Effect	9.8%	2.5%
Net Cost Savings	7.3%	

Table 1.1 shows the projected percents of "stick-built" cost relating to savings and added cost for a typical TANK project. The major increase is handling and transportation cost followed closely by increased Engineering Cost. The handling and transportation cost are quite visible, the increased Engineering Cost are not.

Engineering Cost increases are directly related to increases in drawings required for intermodule interfaces, specifications, systems control of schedules; coordination of work in the home office against procurement, material control, planning, logistics and transportation requirements for the module assembly site and the construction site.

PENINSULA PLANNING BOARD

CONFIDENTIAL

From: "Dee Wylie" <deewylie1@cox.net>
Subject: PCPB – Community Liaison Group meeting: July 18, 2007 - 4:00
Date: July 14, 2007 6:00:03 PM PDT
To: "James Gilhooly"

Dear Mr. Gilhooly, — PRO - BONO WORK

Thank you for your information. I can see it is very important and hope our schedule can accommodate you this coming Thursday.

This is the meeting to which I referred. We only have one person on this committee and he is not a board member. His name is John Adriany and he has worked with the Navy in civilian capacity and is highly creditendialed as well. He is alarmed about some of the things the Navy has not been upfront about and we can't seem to get others as concerned. NOTE OIL PLUME LEAK

There is so much work to be done here on the Peninsula and folks like your self can make a big difference.

If you would like to be involved this would be a big help for us

I look forward to meeting you and having you on the schedule.

D. Wylie ChairPeninsula Community Planning

From: "Dee Wylie" <deewylie1@c
Date: September 18, 2007 2:48:50
To: <ghalbert@ci.santee.ca.us>, <valg
Subject: FW: Info from D.

July 2007

Hi Gary and Jim,

Gary I am sending this on to you with an introduction to Jim Gilhooley came and spoke with us about the Digester Gas project and is in fact with Jay and Darold on that issue. I have gotton more acquainted with him as he has been attending the Navy Plume meetings and as an expert consultant in this field has had very valuable input. Please call Jim hear also his ideas about the many projects and the traffic gridlock it will result. Jim's # is 619-223-9768

Thanks Gary and Jim,

D.

PART OF OVERSIGHT TEAM ON ~~NAVY PROJECTS~~ MULTIPLE NAVY PROJECTS

WESCO WORLDWIDE ENGINEERING SERVICES COMPANY

WWESCO

WORLDWIDE ENGINEERING SERVICES COMPANY

SERVING THE CONSTRUCTION INDUSTRY

Equitable Contract Adjustments (Claims)
Management Consulting
Scheduling and Cost Control
Project Troubleshooting

SOCIO/POLITICAL ISSUES

- Organized Public Opposition Groups
  - Siting (NIMBY)
  - Long Development Period
- Health Risk Assessments

40 YEARS - EXPERIENCE

WWESCO

WORLDWIDE ENGINEERING SERVICES COMPANY

James Gilhooly

3451 TRUMBULL STREET
SAN DIEGO CA 92106
TEL (619) 223-9768
FAX (619) 223-8939

REFINERIES AND CHEMICAL PLANTS

WWESCO has developed and successfully used Inspection and testing processes for the following systems, units, and associated parts.

Piping & Tubing, all type and size of fluid and gaseous

Distribution systems

Reactors

Compressors & sub-systems including piping

Condensers

Lube oil systems

Hydraulic systems

Grease systems

Boilers - All types and sizes

Heaters & coolers

TOWERS

Fractionating towers

Stabilizing towers

Debutanizers

Depropanizers

Rerun towers

Distillation towers

De-ethanizers

Glycol towers

Furfural towers

Absorbers

Side-cut strippers

Alkylation strippers

Others

Tanks, vessels - All sizes, construction & configurations.

SAN DIEGO INTERNATIONAL AIRPORT

QUALITY AUDIT & SURVEILLANCE PLAN FOR ALL FUEL TANK JOBSITES (ERECTION AND NON-ERECTION SCOPE)

A. AUDIT AND REVIEW ERECTION CONTRACT QUALITY REQUIREMENTS, DRAWINGS, SPECIFICATIONS AND RESPONSIBILITIES WITH CONTRACTOR

B. AUDIT AND REVIEW COMPLETE SDIA AND COMMERCIAL INSPECTION PROGRAMS WITH CONTRACTORS, WHERE APPLICABLE.

C. AUDIT AND REVIEW WELDING PROGRAM, INCLUDING WELD PROCEDURES, OPERATOR QUALIFICATIONS, WELD SCHEDULE, WELD MAPS, ETC.

D. AUDIT AND REVIEW JOBSITE RECEIVING, NONCONFORMANCE AND BACKCHARGE PROCEDURES.

E. AUDIT AND REVIEW BOTH AIRPORT & CONTRACTOR INSPECTION TRAVELERS.

F. AUDIT AND REVIEW AUTHORIZED INSPECTION AGENCY INVOLVEMENT.

G. AUDIT AND REVIEW PREHEAT AND P.W.H.T. PROCEDURES.

H. AUDIT AND REVIEW OVERALL N. D. E. PROCEDURES AND REQUIREMENTS.

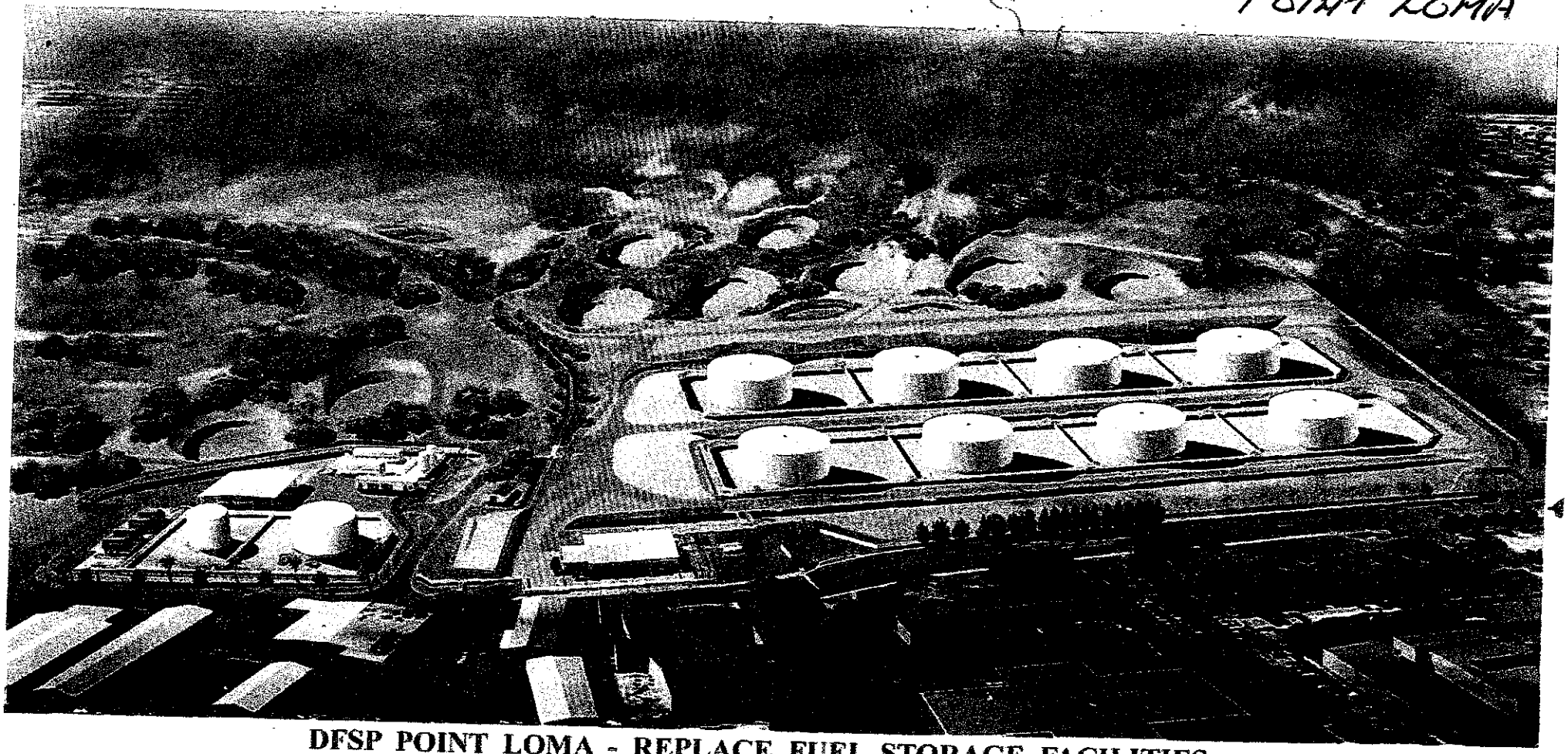
I. AUDIT AND REVIEW HYDROSTATIC AND FUEL TIGHTNESS PROCEDURES.

J. REVIEW PROPOSED API & NON-API DOCUMENTATION PACKAGES.

U.S NAVY
SAN DIEGO
PT. LOMA
FUEL FARM
REPLACED.

Award-Winning Tanks Take Miles of Welds

U.S NAVY (S.D.)
COMPLETE
FUEL FARM
RENEWED
POINT LOMA

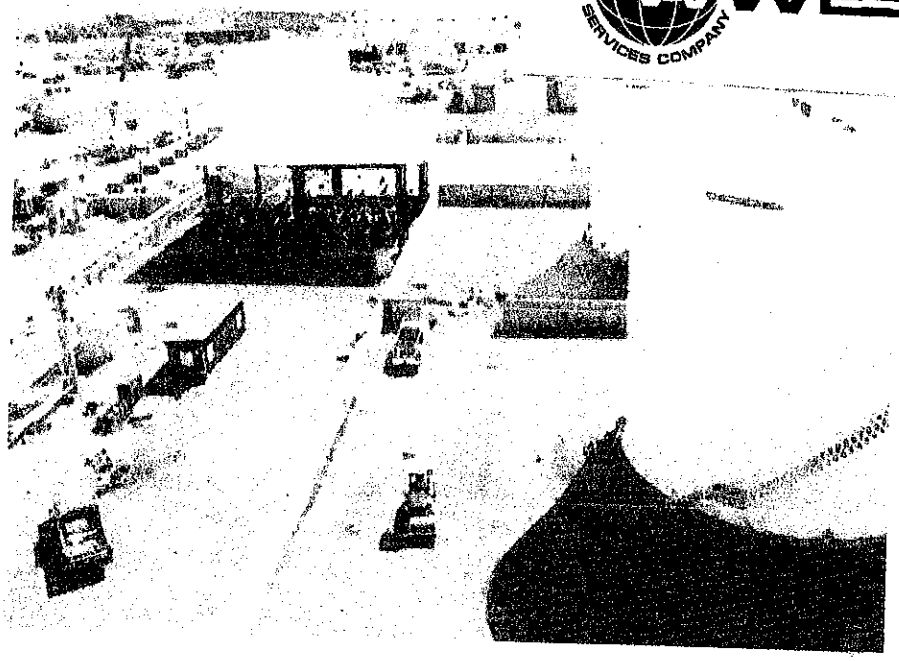


DFSP POINT LOMA - REPLACE FUEL STORAGE FACILITIES
FISC SAN DIEGO, CALIFORNIA

(*) REPLACING ELEVEN (11) ABOVE GROUND AND 43 (UNDERGROUND TANKS)
3000 VALVES AND 30 MILES OF FUEL PIPING.

NAVY – NORTH ISLAND – SAN DIEGO

WESCO



Naval Station North Island, San Diego, California (Completion: June 2004)
Client: U.S. Navy

This project involved the construction of four new 13,500 barrel aboveground jet fuel (JP-5) bulk storage tanks with cathodic protection, leak detection, secondary containment and automatic high level shutoffs. Also included in the project construction was a 2,400 GPM pumphouse with fuel pumping equipment and programmable PLC panel, carbon steel fuel distribution piping, a truck loading and unloading station, utilities, and site improvements.

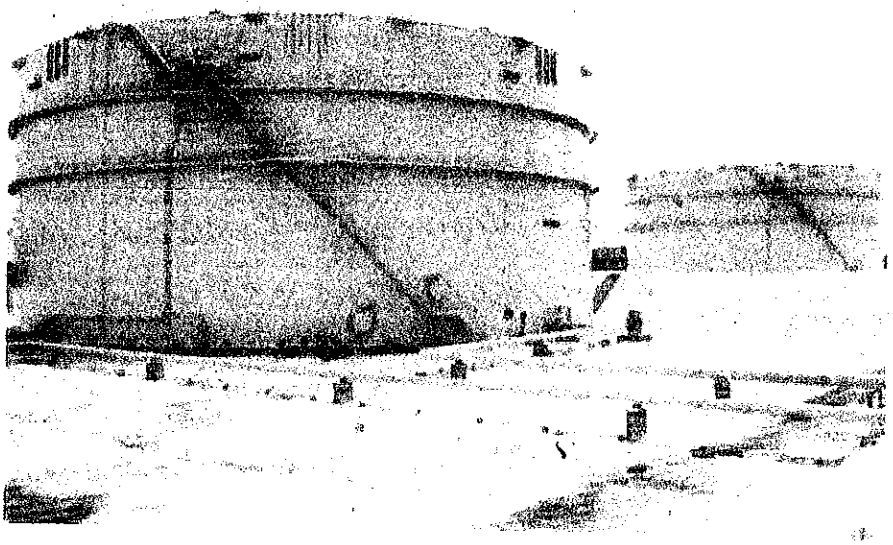
Nova also constructed two new hot refueling sites with the installation and welding of approximately 340 linear feet of direct buried double contained fuel pipe, 165 linear foot jack and boring of casings for double contained fuel pipe under two active taxiways and two concrete fueling stations for aboveground fuel pipe and pantograph systems. These two new hot refueling stations feed from the new aboveground fuel storage tanks and pumping station.

Nova incorporated four existing 500,000 Gallon underground fuel storage tanks into the system with the new aboveground tanks.

Upon completion of all construction activity, Nova's specialty fueling system supplier Bay Associates, conducted the system start-up, commissioning, testing and system prove-out prior to use by the military.

NAVY - GUAM FUEL SYSTEM

WESCO



Andersen Air Force Base, Guam
(Completion: October 2002)
Client: U.S. Navy

Phase 2: Nova installed a new Military Type III hydrant fueling system with a 2,400 gallon-per-minute (GPM) precast, 3,750 SF concrete pumphouse. The mechanical fueling equipment included 600 GPM fuel transfer pumps, numerous control valves, issue filter separators, receipt filter separators and micronic filter, a Pump Logic Control (PLC) panel and graphic display panels, 400 kW emergency power Generator; 12 kV/480 volt Motor Control Center and Main Distribution Board, other electrical panels and interior lighting.

Also constructed were two 1,590 cubic meter (10,000 BBL) vertical aboveground JP-8 steel fuel storage tanks with a fixed cone roof structure and aluminum honeycomb floating plans. Nova resurfaced the site with 88,350 SF of Asphalt Concrete pavement and 74,500 SF of POL Area 8" and 5" thick Portland Cement Concrete.

The new work on the apron was separated into 3 phases of construction that included over 15,000 lf of buried 14" stainless steel piping. The airfield concrete pavement work consists of approximately 183,000 SF 12" thick and pavement stripping removal and replacement.

Phase 5: Nova constructed two 15,900 cubic meter (100,000 BBL) aboveground JP-8 jet fuel steel storage tanks with a center pipe supporting fixed cone roof and a pumphouse, installed transfer pumps, control valves, filter separators, micronic filters, PLC panel, graphic display panels, and 400kW emergency power generator. Nova removed ten 50,000 gallon underground jet fuel and two 1,500 gallon waste fuel tanks; 10,500 LF of underground receipt and issue piping, ten hydrant outlets and lateral control pits and pumphouses with interior piping and fuel equipment.

U.S. ARMY - ALASKA - FUEL FARM
ELMENDORF

WESCO

Elmendorf Air Force Base, Alaska
(Completion: February 2000)
Client: U.S. Army Corps of Engineers

This project consists of construction of three new 83,300 barrel (bbl) aboveground welded steel jet fuel (JP-8) bulk storage tanks with fixed roofs, floating pans and impervious dikes, 12,200 linear feet of 12 inch receipt pipeline, a new 1,800 gallon-per-minute (gpm) pumphouse/operations building, a truck fill stand, and two fiberglass low point pits. Site improvements included pavement and two access roads, water service, 12 kV electrical service, and deep well cathodic protection. Security fencing and lights were also required.

The 1,200-square foot pumphouse construction consisted of a new structural steel building complete with four Union 600 gpm pumps, five M.E. Industries fuel filter separators, CLA-VAL control valves, General twin seal plug valves, a programmable PLC system, and a fire protection alarm system. Due to the extreme weather conditions in Alaska, the pumphouse required a complete heating and ventilation system in addition to being a completely enclosed facility. A 4,000 gallon product recovery tank was installed adjacent to the pumphouse.

The project required the installation of an additional 8,200 linear feet of direct bury carbon steel 10" issue pipe adjacent to the 12" receipt line. Pig launchers and receivers are also included. The new 10" issue line connects the new bulk fuel storage tanks to the West Ramp Hydrant Fuel System (installed by Nova under another contract).

Also included was demolition of four aboveground 25,000 bbl North Jet Fuel Tanks and two aboveground 20,000 bbl South Jet Fuel Tanks.

LARGE FUEL TANK FARM - PHILIPPINES

WORLDWIDE ENGINEERING SERVICES CO

WWESCO

PHILIPPINES

PROJECT PROVIDE MODERN

DIMENSIONS OF GOVERNED BY SIZE OF TANKS

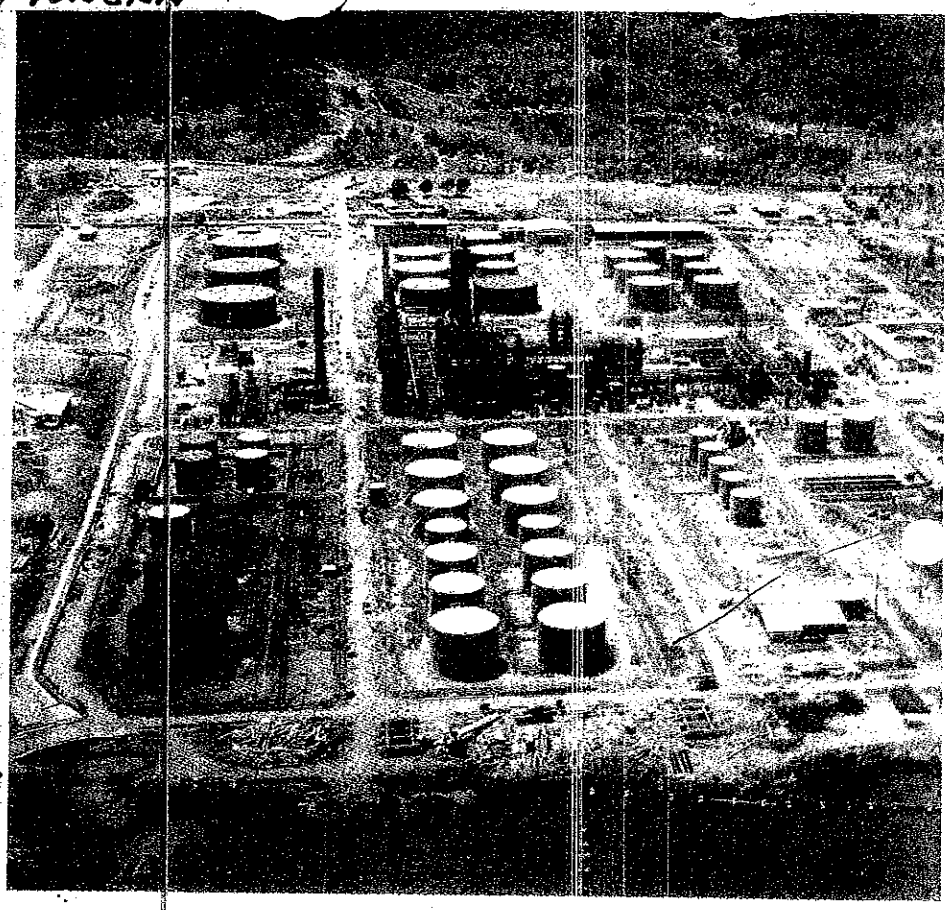
SIZE OF OPERATIONAL BUILDINGS // OFFICE WASHROOMS

FUEL LINES, PUMPS, VALVES

BACK-UP GENERATOR

DECK HAS TO BE SAFE HEIGHT ABOVE HIGH TIDE OR FLOOD LEVEL.

AREA SHOULD BE DREDGED TO ACCOMMODATE LARGE TANKS



Above right: Philippine Petroleum Corporation — Supply and fabrication of 58 vertical storage tanks for a tank farm in Pililla, Rizal.

STABILITY OF PIER & BANKS MAYBE IN JEOPARDY. BECAUSE OF AGE & DETERIORATION IMPACT LOADS

* SUGGEST DRIVING STEEL SHEET PILES BELOW LEVEL OF SEA BED WITH THEIR HEADS SUPPORTED BY STEEL TIE RODS TO CONCRETE ANCHOR BLOCKS SET BACK TO STABLE GROUND.

PUMP LOGIC CONTROLS

AUTO SHUT-OFF VALVES

FIRE ALARMS / EMERGENCY GENERATOR

FUEL TRUCK LOADING BACK-UP OPTION

WESCO

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
2301 AIRPORT BLVD. P. O. BOX 2288
MOBILE, ALABAMA 36601

IN REPLY REFER TO

AREA ENGR, VAAP

TANKS
PIPELINES
CHATTANOOGA
JOLIET
RADFORD

10 June 2012

INSP.

COMPLETE TANK FARM
FUEL (TANKS/PIPING/VALVES)
STATIONS AT

LOCATION 1 — CHATTANOOGA TENN.

LOCATION 2 - JOLIET ILL.

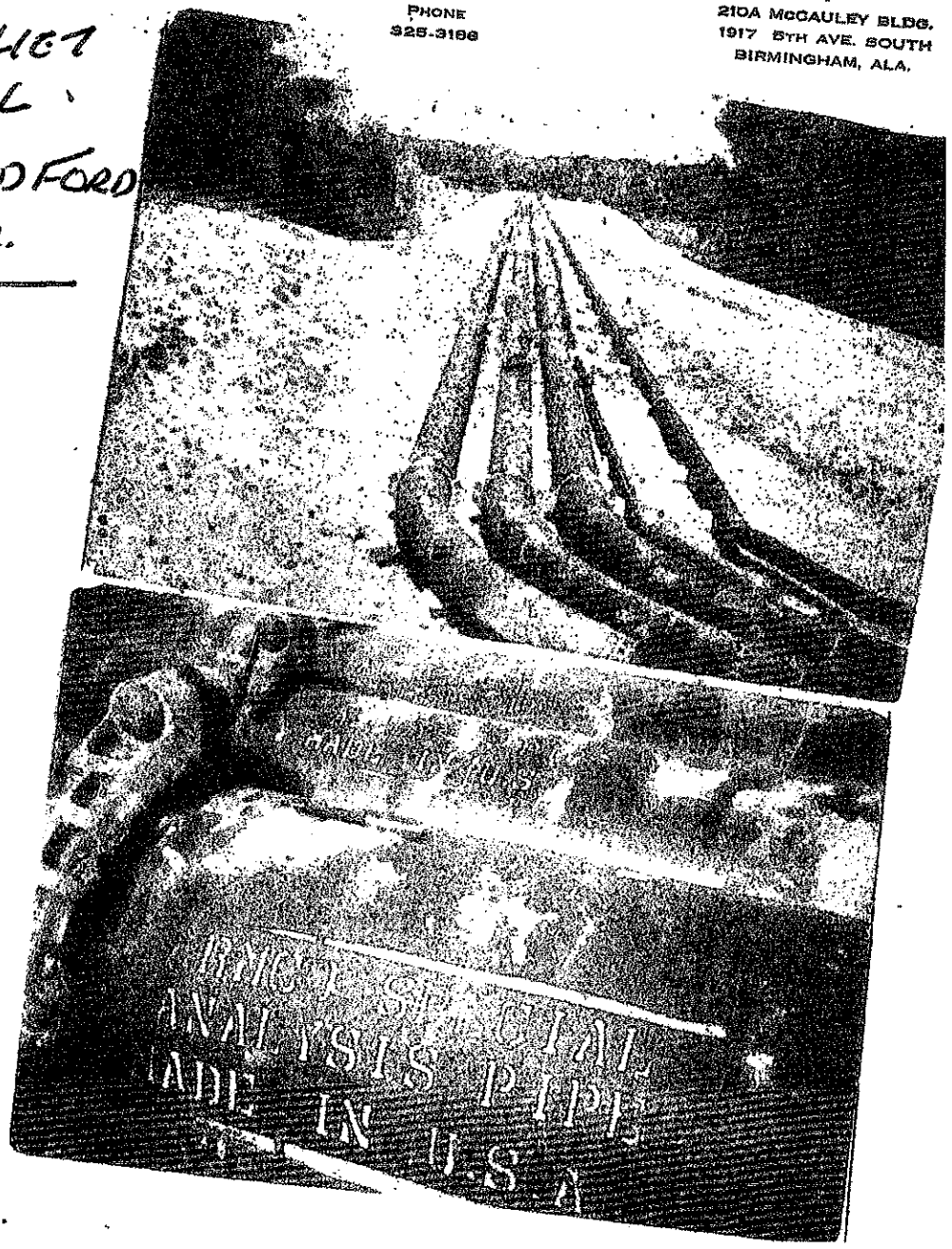
LOCATION 3 - RADFORD VA.

DANIEL A. HIXON
RESIDENT INSPECTOR
U.S. ARMY CORPS OF ENGINEERS
BIRMINGHAM INSPECTION OFFICE

PHONE
325-3196

210A McCAULEY BLDG.
1917 5TH AVE. SOUTH
BIRMINGHAM, ALA.

205



NOTE — 2012
MADE
IN AMERICA
STENCILS ON ALL
PIPELINES/TANKS

SUBMITTED OVERSIGHT / AUDIT BID IN 1997 ON LINDBERGH CONST. PROJECT.

Port of San Diego
and Lindbergh Field Air Terminal

(619) 686-6200 • P.O. Box 488, San Diego, California 92112-0488

February 27, 1997

Mr. James Gilhooly
WWESCO
3451 Trumbull Street
San Diego, California 92106

Dear Mr. Gilhooly:

Subject: Lindbergh Field Construction Program

Your recent letter to Commissioner David Malcolm has been referred to me for action. In November 1996 the Board of Port Commissioners retained Deloitte & Touche Consulting Group to prepare a thorough analysis of the Lindbergh Field Construction Program (LFCP). The report, finalized on February 4, included comprehensive recommendations to enable the District to complete the work on time and within a reasonable budget. On February 4 the Board approved a budget for the completion of the LFCP and directed staff to implement the recommendations included in the report.

Your letter included suggestions as to how the District could move toward successful completion of the program. Many of the items you noted have been incorporated into the program. Several, such as regular meetings with the contractors, have been taking place for well over a year while others have been incorporated in the past few months. In addition, the Deloitte & Touche report provided the District with a detailed recovery plan. (NOTHING ON CONST. CLAIMS! FROM DELOITTE)

The District is confident effective implementation of the recommendations in the Deloitte & Touche report will ensure the program is completed on time and within the established budget. The lessons learned from this experience are valuable and are already being applied to other areas of the District.

Thank you for your interest in the District. We are always interested in identifying qualified consultants to assist staff in meeting our goals.

DELOITTE PROGRAM OKAY ON PAPER! NEEDS HANDS ON OVERSEER IN FIELD TO ENSURE ELEMENTS OF PROGRAM ARE CARRIED OUT IN ACCORDANCE WITH COSTS AND AGREED UPON "SCHEDULE"

Field Construction Program, your experience, your area of expertise and opportunities for the future.

Sincerely,

GRADY D. DUTTON
Senior Director, Public Works/
Chief Engineer

GDD:aw:6971

TEL - 686 - 6238

cc: Board of Port Commissioners
Lawrence M. Killeen, Executive Director

3/14/97

DELOITTE/TOUCHE PROGRAM RECOMMENDATIONS

LOOKS OKAY ON PAPER!
NEEDS - HANDS ON OVERSIGHT IN THE FIELD.
TO ENSURE ELEMENTS ARE CARRIED OUT
IN ACCORDANCE WITH COSTS AND AGREED UPON
"SCHEDULE"

DELOITTE DID NOT ADDRESS CONST. CLAIMS!
RESOLVING DISPUTES!
AMONG CONTRACTORS!
OVERLAPPING SCHEDULES!
PROTECTING AIRPORT FROM QUESTIONABLE
CONTRACTOR CLAIMS!

From: Alan Gordon <agordonnoise@gmail.com>
Sent: Friday, December 28, 2018 12:43 PM
To: Airport Planning
Cc: Alan Gordon
Subject: NOP for EIR of Fuel Farm Expansion Project

San Diego Regional Airport Authority
Attention: Ted Anasis

Dear Sirs, I have reviewed the Fuel Farm Expansion Project and have the following comments for the draft EIR.

1) I think the proposed size of the fuel containment area is inadequate and needs to be reviewed. Having the containment area large enough to contain only the total volume of the single largest tank, of the total five tanks, is insufficient. If there was a catastrophic event, such as an earthquake or a plane or vehicle hitting the fuel farm, it seems likely that more than one tank would be impacted and the containment area needs to address this.
2) The 58 foot height of the proposed tanks, that far exceeds the costal commission 30 foot height limit, needs to be reviewed in the EIR.
3) The EIR also needs to address the impact of climate change and the resulting rising sea levels. The impact of rising sea level needs to be evaluated for the impact on the structural integrity of the proposed project as well as the biological risk the rising sea level has for the large increase in storage of hazardous fuel.

Thank you for your consideration,

Alan Gordon
4404 Alhambra St.
San Diego, CA 92107
858-245-7213

Sent from Mail for Windows 10

RECEIVED
DEC 28 2018
BY: .....

From: Katheryn Rhodes <laplayaheritage@gmail.com>
Sent: Friday, December 28, 2018 3:59 PM
To: Airport Planning; Anasis Ted
Subject: SDIA Additional Fuel Tanks CEQA NOP Public Comments

Hi SDIA, SDCRAA, and Mr. Ted Anasis:

Thank you for the opportunity to comment on this infrastructure project for the three, 1.15-million gallon, above-ground, 58 feet diameter, and 58 feet high Fuel Tanks.

This email serves as my official public comment. In the future please provide email addresses in the NOP, EIR, and CEQA documents for the public to use. Allow emails, instead of asking only for hardcopies of letters to be mailed or delivered. I do not have a printer.

Please confirm or deny active faulting at the CEQA Stage for the new and expanded Fuel Tanks through valid fault investigations turned into the State Geologist. Although the Airport is not within an Alquist-Priolo (A-P) Earthquake Hazard Zone, active faulting was confirmed at the east side of the Airport property as part of the Rental Car Center. Therefore active faulting through the whole of the Airport footprint on liquefiable soils should be investigated for the first time.

For the last 15 years, the active Fault Investigations and corresponding letters to the State Geologist to update the AP-Maps since 2003 have not been sent in accordance with State law PRC 2697. Please discuss how you will turn in all fault investigations into the State Geologist to update the old 2003 Point Loma Quadrangle AP-Maps, and confirm or deny active faulting in consultation with the State Geologist and SANDAG. Even though the Downtown Special Studies Zone and AP-Maps have Harbor Drive as their Northern Boundary, and stop abruptly at Airport property due to failure to send scientific planning evidence to the State.

Instead of above-ground tanks, unknown foundations, or a foundation on piles, please consider a bathtub structural foundation that gets rid of all liquefiable soil material so the structure can be founded on bedrock @ 30 to 40 feet below grade. So the top of the structures are not 58 feet above current grade. The partially below-grade Tanks would replace liquefiable soils and their foundations would be embedded into competent formational soils.

Bathtub foundations were used for the County Administration Center (CAC) and the Port Headquarters. And are planned for Manchester Pacific Gateway Navy Broadway Complex (NBC), and Seaport Village.

In addition, instead of only concrete containment dike walls between fuel container tanks, please consider using a watertight bulkhead configuration, similar to dry docks.

Regards,

Katheryn Rhodes
371 San Fernando Street
San Diego, California 92106
619-402-8688
laplayaheritage@gmail.com

RECEIVED
DEC 28 2018
BY: .....

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=2697.&highlight=true&keyword=State%20Geologist+copy

http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=2.&title=&part=&chapter=7.8.&article=

Seismic Hazard Mapping 2690-2699.6
Public Resources Code PRC 2697
2697.

(a) Cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. If the city or county finds that no undue hazard of this kind exists, based on information resulting from studies conducted on sites in the immediate vicinity of the project and of similar soil composition to the project site, the geotechnical report may be waived. After a report has been approved or a waiver granted, subsequent geotechnical reports shall not be required, provided that new geologic datum, or data, warranting further investigation is not recorded. Each city and county shall submit one copy of each approved geotechnical report, including the mitigation measures, if any, that are to be taken, to the State Geologist within 30 days of its approval of the report.