Clean Transit Advancement Campus

Federal Transit Administration
Categorical Exclusion Worksheet

Prepared for:

SANDAG
401 B Street, Suite 800
San Diego, CA 92101

MTS Metropolitan Transit System
1255 Imperial Avenue, Suite 900
San Diego, CA 92101

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

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I. INTRODUCTION

The purpose of this worksheet is to provide sufficient documentation and environmental analysis under the National Environmental Policy Act (NEPA) to help inform the Federal Transit Administration (FTA) to make a determination that a Categorical Exclusion (CE) pursuant to 23 Code of Federal Regulations (CFR) 771.117(d)(8) is the appropriate NEPA class of action for the proposed Clean Transit Advancement Campus Project (project). CEs are categories of actions (i.e., types of projects), which meet the definition contained in 40 CFR 1508.1 that the FTA has determined, based on its experience, typically do not individually or cumulatively have a significant effect on the human environment and which generally do not require the preparation of either an environmental impact statement (EIS) or an environmental assessment (EA). FTA CEs are listed in 23 CFR 771.118; however, the most applicable codified CE for the project is listed in the Federal Highway Administration (FHWA) CEs identified in 23 CFR 771.117. Specifically, 23 CFR 771.117(d)(8) incudes construction of new bus storage and maintenance facilities. Provisions in 23 CFR 771.118(e) allow for cross-agency use of codified CEs. Thus, FTA can use FHWA or Federal Railroad Administration CEs.

This worksheet follows the format and content guidelines contained in the document, *FTA Region 9 Supporting Information for Probable Categorical Exclusion*, Version December 2020.

II. ENVIRONMENTAL ANALYSIS

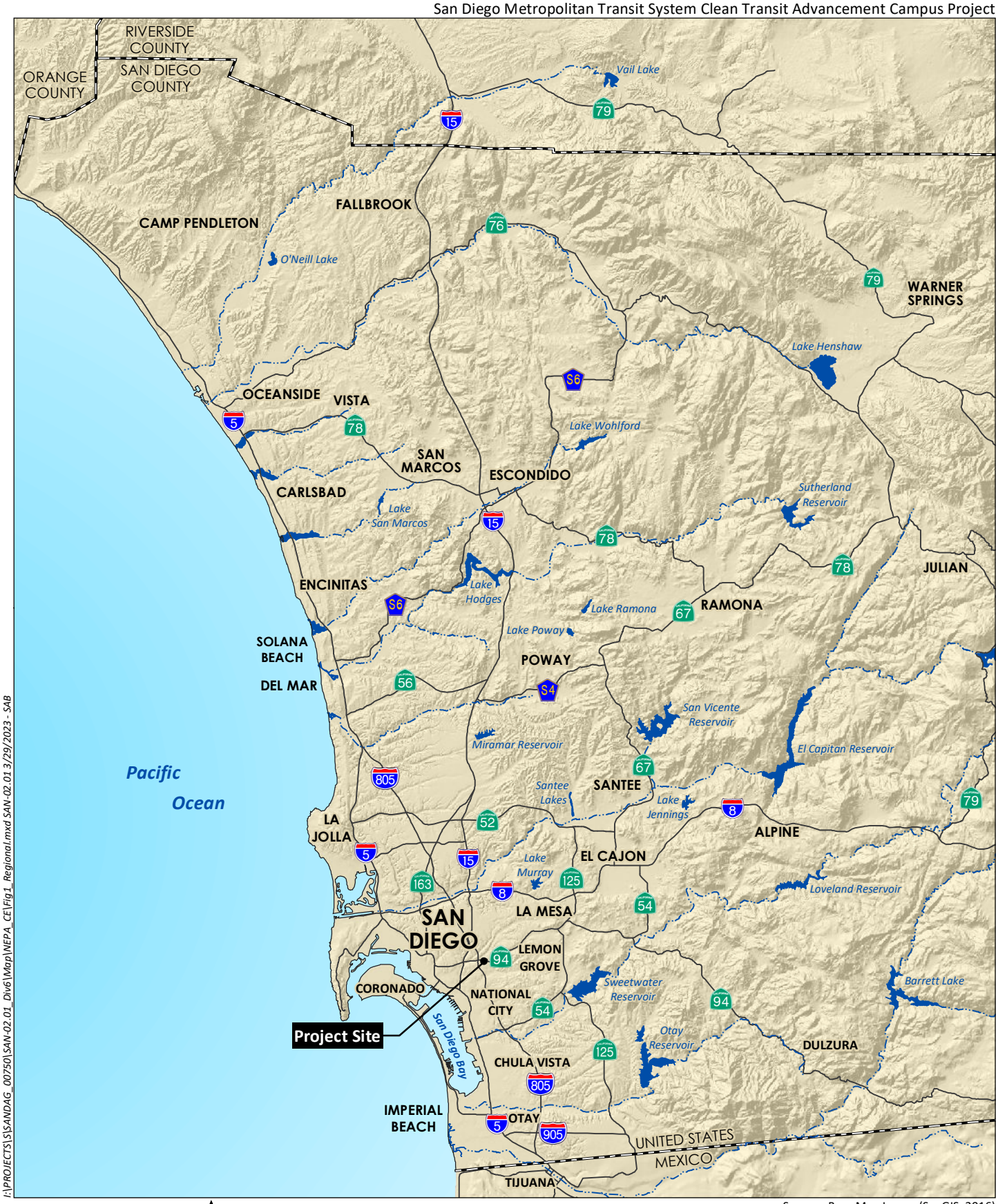
A. DETAILED PROJECT DESCRIPTION

The San Diego Metropolitan Transit System (MTS) and San Diego Association of Governments (SANDAG) propose to construct the Clean Transit Advancement Campus (CTAC), a new bus maintenance and charging facility for electric buses, within the central portion of MTS' current and future operational bus service footprint near the Interstate 805 (I-805)/State Route 94 (SR 94) interchange in the City of San Diego.

The proposed project is located north of Federal Boulevard and west of 47th Street and divided in two portions. The smaller portion of the project site occurs on the eastern side and is proposed for employee parking and an administration/operation building, and the larger portion occurs on the western side and is proposed for bus parking/charging, maintenance bays, bus washes, and an operations building. Access to the project is proposed to be located at up to four driveways along the Federal Boulevard project frontage. A new traffic signal would be installed at the western-most site driveway.

The proposed project is located near the I-805/SR 94 interchange in an urbanized area primarily developed with industrial uses. The project site is bounded by Federal Boulevard and industrial uses to the south; industrial uses to the west; open space and industrial uses to the north; and industrial uses, 47th Street, and commercial uses to the east. Figure 1, *Regional Location*, depicts the regional location of the project site, and Figure 2, *Project Location*, shows the location of the project site and surrounding areas on an aerial photograph.

The project is a joint effort between MTS and SANDAG. MTS would acquire the necessary property and SANDAG would build the new facility. MTS would be the owner and operator.



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0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

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Regional Location

Figure 1

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Source: Aerial (SanGIS, 2019)

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Project Location

Figure 2

Purpose and Need

MTS operates bus services out of five "divisions" where buses are parked, fueled or charged, cleaned, and maintained while not in service. These divisions are located throughout the MTS service area to optimize proximity to routes and services. This minimizes unnecessary travel, cost, and fuel, and enhances their ability to respond to operational needs in a timely manner. Each division has space for 150 to 250 buses and can be up to 12 acres with as many as 600 employees.

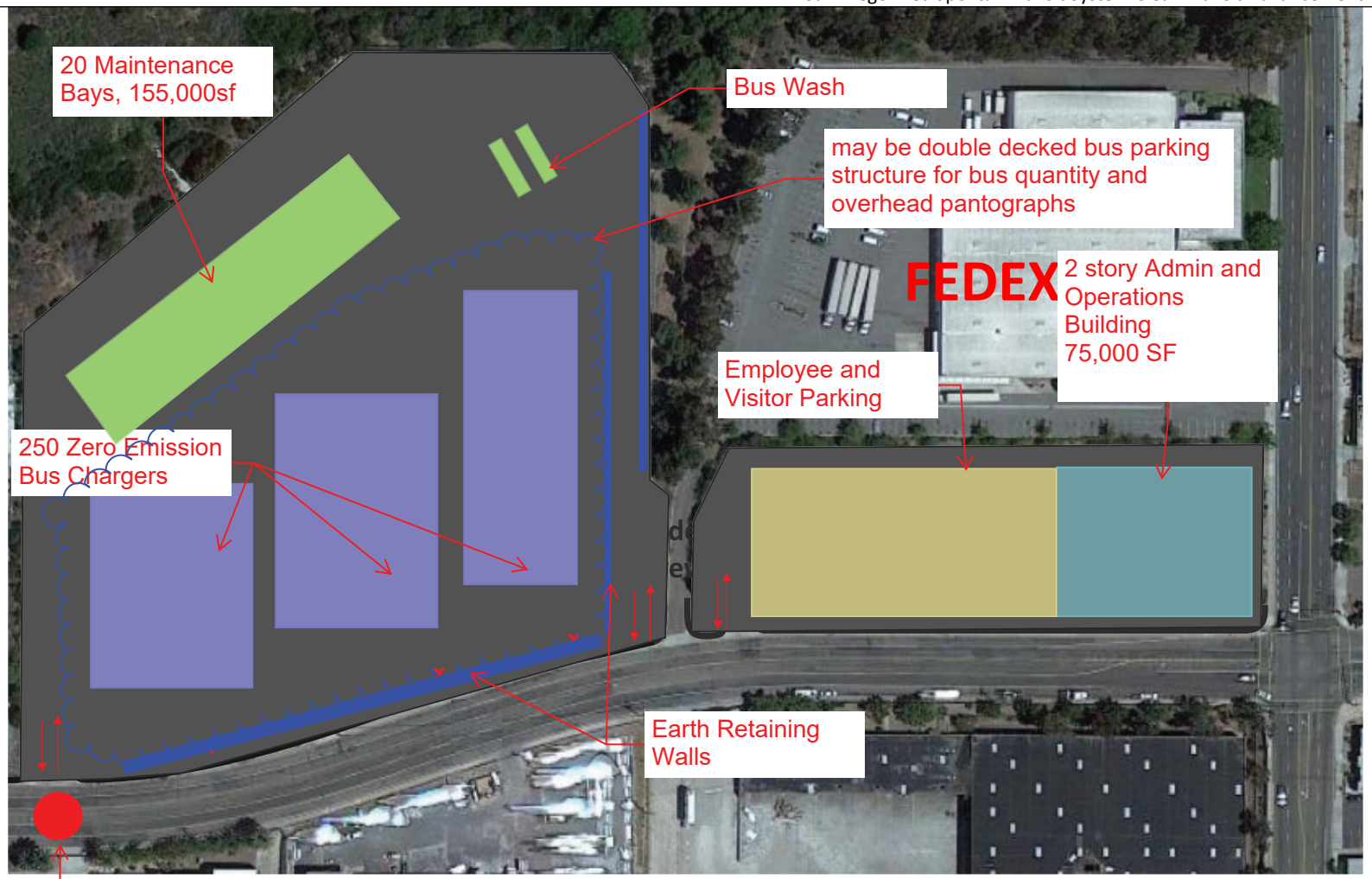
With approximately 700 buses in the MTS bus fleet, the current divisions are nearing maximum capacity. Plans for growing the transit system over the next 30 years will require room for more buses. In addition, the transition to a zero-emission bus (ZEB) fleet over the next 20 years will require new charging infrastructure at the MTS divisions that will reduce available space for buses. As a result, MTS has identified the need for an additional new bus division facility to ensure successful operation of MTS bus fleets and routes.

The objectives of the project are as follows:

- To respond more efficiently to service requests in the service area regarding routing, scheduling, refueling, etc.;
- To improve transit service in downtown San Diego and surrounding communities by increasing operating capacity system-wide through the addition of maintenance and operational capacity for up to 250 buses at an operating base within the central San Diego area;
- To reduce pressure at currently overburdened facilities;
- To support MTS' conversion from its compressed natural gas fleet to a new ZEB fleet, and provide facilities to support ZEB electric charging and other ancillary fueling needs;
- To have sufficient facilities to accommodate expected demand, inclusive of bus and employee parking, maintenance bays, ZEB electric charging, bus wash bays, employee office spaces, and other ancillary uses; and
- To promote cost savings by improving the efficiency of transportation service delivery with a facility located in the geographic center of its service area, placing buses closer to their routes, thereby reducing operating costs, non-revenue miles, and bus maintenance down time.

Project Characteristics

MTS and SANDAG propose to construct the CTAC, a new bus maintenance and charging facility for electric buses, near the intersection of Federal Boulevard and 47th Street in the City of San Diego. The proposed project is located north of Federal Boulevard and west of 47th Street and divided in two portions that are separated by a driveway/access road to a FedEx distribution center. The smaller portion of the project site occurs on the eastern side (east of the FedEx driveway) and is proposed for employee parking and an administration building, and the larger portion occurs on the western side (west of the FedEx driveway) and is proposed for bus parking/charging, a maintenance facility building, and bus washes. Access to the project is proposed to be located at up to four driveways along the Federal Boulevard project frontage. A new traffic signal would be installed at the western-most site driveway. Figure 3, *Site Plan Concept*, provides a schematic layout of the proposed project components.



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Site Plan

Figure 3

The existing nine buildings on site would be demolished and a new bus division facility would be constructed. The existing buildings consist of a variety of one- to two-story structures, some of which are occupied by industrial uses. The proposed new bus division would entail the construction of a new bus maintenance facility building, charging facilities, bus wash facilities, equipment lift facilities, storage facilities, bus parking facilities, administration and operations office buildings, employee parking, lighting improvements, security and camera improvements, stormwater improvements, utility relocations, and landscaping and irrigation improvements.

Two to four new buildings would be constructed to accommodate maintenance and service functions, administrative space, and potentially some auxiliary uses. A maintenance facility building would be constructed on the western portion of the site that would encompass approximately 155,000 square feet (sf) and would include maintenance support areas, 20 repair service bays, a body shop, a tire shop, bus wash and service areas, charging stations, storage areas, restrooms, and mechanical and electrical rooms. Administration and auxiliary use space would encompass a total of approximately 75,000 sf and would be housed in one to two buildings. The administration building(s) would include general administration areas, conference rooms and training spaces, storage, security office, changing room and locker area, restrooms, area for future day care services, custodial room, recreation area, lounges, break/lunch room, radio dispatch, clerk facilities, and mechanical and electrical rooms. Administration buildings would be constructed on either or both the western and eastern portions of the site, depending on final design to accommodate up to 250 buses. Additionally, an employee parking lot or structure would be constructed on the eastern portion of the site. The new buildings would range between one to three levels, and up to three levels may be visible from Federal Boulevard due to site and area topography. The proposed facility would be designed to achieve a LEED certification and would also include rooftop solar panels.

Charging facilities would include up to approximately 250 ZEB electric chargers. The new facility would include a total of about 120 administrative offices. The number of employees at full buildout would include approximately 300 bus operators, 125 maintenance staff, and 150 administrative staff.[1] The facility would operate seven days a week, 24 hours a day. The number and type of employees per shift would include approximately 200 bus operators, 50 management/administrative staff, and 30 maintenance staff.[2] Approximately 500 daily electric ZEB trips would be dispatched from the new facility.

The new facility would also include asphalt or concrete surface and/or structured parking for approximately 250 buses, approximately 350 employee vehicles, and approximately 60 non-revenue vehicles (i.e., bus supervisor, relief, and maintenance vehicles). Some employee vehicles may be able to utilize bus parking areas during the day. Parking facilities would encompass a total of approximately 136,000 sf.

Retaining walls would be constructed in some locations along the bus parking/charging lot. Proposed fencing would consist of a combination of block wall and/or chain link and would vary from

[1] It is anticipated that most employment opportunities at the proposed project would be filled by existing residents in the region, including but not limited to residents located near the new facility. MTS will comply with all employment and labor laws and regulations that apply to the staffing of its transit facilities. Potential physical changes associated with economic or social changes from the proposed project have been identified and analyzed in this document.

[2] The number of employees per shift represents full buildout operational conditions and is based on similar bus fleet and maintenance parameters at MTS' South Bay Maintenance Facility. It is likely that these numbers could be lower at project opening and would gradually increase to the buildout numbers.

approximately 6 to 12 feet above grade depending on whether it was near the frontage or near adjacent properties. Proposed exterior lighting would be installed along the perimeter of the facility to ensure security and would be shielded or directional to minimize spill into adjacent properties and open space.

Utilities within the project site would be relocated, as required, and stormwater improvements would be constructed. Driveways would also be relocated and modified during project implementation. As noted above, one signalized driveway and up to three unsignalized driveways would be provided for access to the project site from Federal Boulevard (refer to Figure 3). Driveways would be sited, designed, and constructed pursuant to applicable regulations to allow for adequate circulation along Federal Boulevard. The project would also include irrigation and landscaping to visually enhance the streetscape.

An existing roadway easement adjacent to and west of the FedEx driveway, as well as various San Diego Gas & Electric (SDG&E) utility easements within the site, would be vacated. An existing open space easement occurs along the northern site boundary and the project would not encroach into this easement.

For purposes of environmental analysis, construction of the project is estimated to begin in mid-2024 and take approximately 18 months to complete, for a projected opening year of 2026. Project construction would involve the demolition of approximately 113,000 sf of existing industrial buildings that would generate an estimated 16,100 tons of debris to be hauled off-site. The analysis assumes that grading would occur over most of the site and would be balanced on site. Although not anticipated, some nighttime work may be necessary where specific work activities would disrupt traffic or potentially create safety concerns. A Multi-Habitat Planning Area (MHPA) Construction Noise Control Plan and a Stationary Equipment Noise Control Plan will be prepared and implemented and will address activities such as potential nighttime work. Construction staging is anticipated to occur within the project site and construction access would be provided via Federal Boulevard.

The project would likely be funded with federal monies through the Surface Transportation Block Grant Program and Transit Infrastructure Grants for Community Project Funding, as well as local funds through MTS' Capital Improvement Program.

Site Selection Process

The site selection process included a detailed screening analysis to identify potential sites for the project and to determine which site(s) should be further considered as the preferred alternative(s) for the project. In order to identify the primary site location criteria for the project, MTS analyzed its current bus routing and its long-range plans for improving and expanding bus transit. The site selection study used MTS scheduling data and geographic information systems (GIS) to determine ideal centroids that would minimize deadhead[3] travel distances and time. Two primary centroids were determined based on the operational scenario of directly operated services (operated by MTS employees) at the Imperial Avenue Division versus all contracted services at the other MTS bus divisions. The centroid associated with directly operated services occurs near the area of University Avenue and 30th Street in the City of San Diego community of North Park. Since this analysis was completed, two major developments occurred that would likely shift this centroid further southeast: Imperial Avenue Division buses with routes in the University City area have been reassigned to the Kearny Mesa Division; and, with the

[3] Travel between the terminal locations and the division is "deadhead" time and distance, which is ideally minimized to reduce cost, congestion, delay, and emissions.

opening of the Mid-Coast Trolley Extension in November 2021, some bus service in the northwestern portion of MTS' service area was replaced by the extended Blue Line light rail services. The centroid associated with contracted services occurs in the area of Euclid Avenue and Market Street in the City of San Diego community of Emerald Hills, near the Euclid Avenue Transit Center.

Based on these two centroids, future service needs would ideally be accommodated by a new bus division located along or near the axis between them, which generally occurs near the confluence of the I-805, SR 15, and SR 94 freeways. MTS expanded the search for potential CTAC sites to an area on either side of the line between these two centroids, to maximize effectiveness and efficiency of a new division, regardless of the operator. This formed the initial study area, as shown in Figure 4, *CTAC Study Area and Potential Sites*, which is bounded by Imperial Avenue on the south, El Cajon Boulevard on the north, Texas Street/25th Street on the west, and 54th Street/Euclid Avenue on the east.

Another important site selection criterion included compatibility with existing land uses. As such, MTS identified potential sites that were zoned and currently being used for industrial or commercial uses. Within the study area, all industrial and commercial areas and properties were initially screened for size, access, and appropriateness. Additionally, MTS sought to identify properties that would not (1) displace residences; (2) build on undeveloped land, park, or natural habitat; or (3) remove community-serving commercial storefronts. Given the central location of the area in the region, as well as topography, most of the area within the study area is primarily residential or open space. This narrowed the focus to a few industrial areas along the SR 15 and SR 94 freeways.

Seven potential site locations were studied and are all located near SR 94 interchanges with I-805 and SR 15 within highly urbanized areas comprised of industrial and commercial development. These locations, depicted in Figure 4, are referenced using the following descriptions:

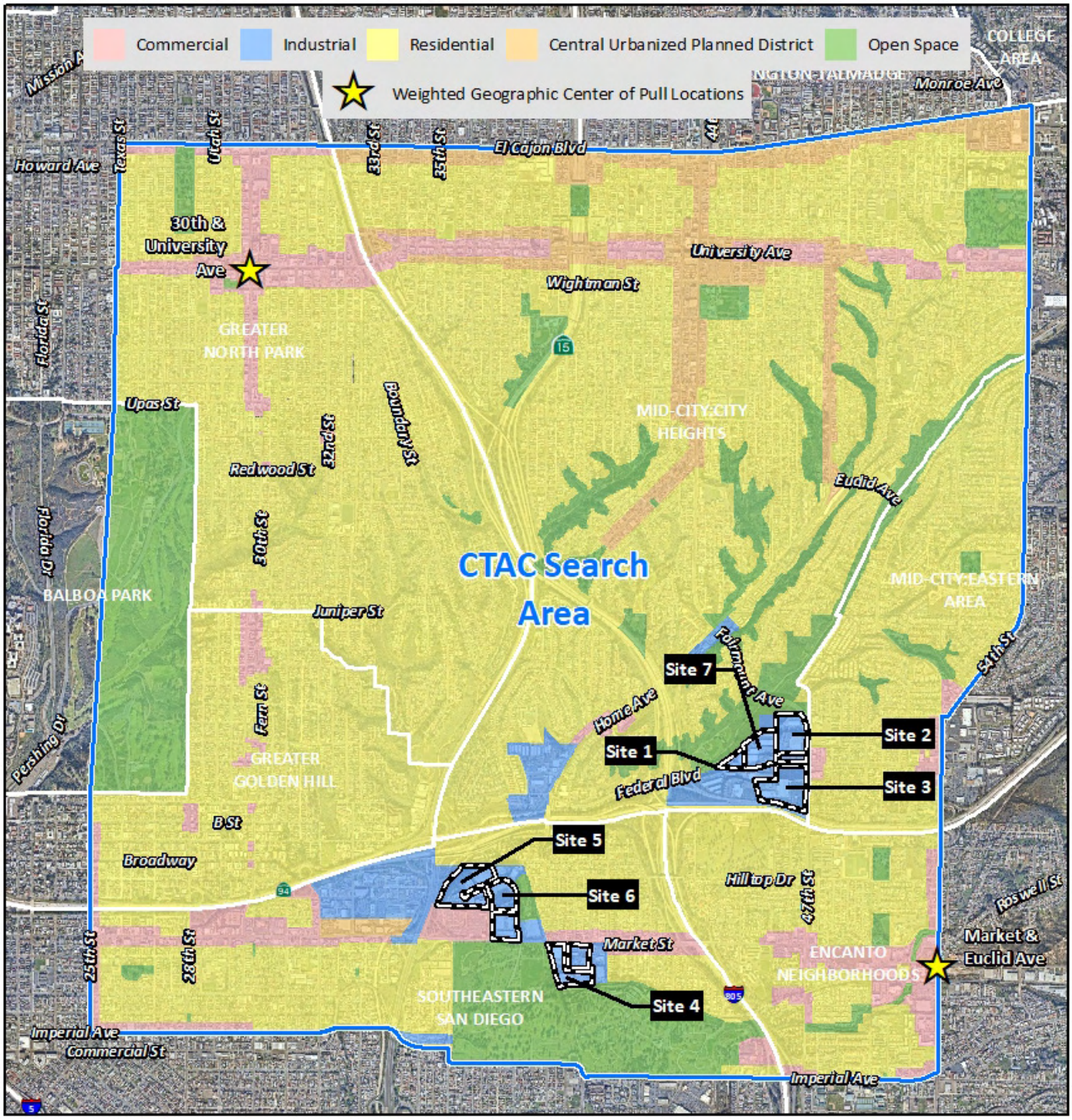
- **Site 1:** 4444 to 4586 Federal Boulevard (12.49 acres). Bound by Sunshine Berardini Field and I-805 on the west, undeveloped land on the north, existing buildings and 47th Street on the east, and Federal Boulevard on the south.

- **Site 2:** 1650 and 1740 47th Street (11.00 acres). Bound by existing buildings and Sunshine Berardini Field on the west, Fairmount Avenue on the north, 47th Street on the east, and Federal Boulevard on the south.

- **Site 3:** 1344-1348 47th Street and Federal/47th Street northwest corner (17.47 acres). Bound by existing buildings on the west, Federal Boulevard on the north, 47th Street on the east, and SR 94 on the south.

- **Site 4:** 3939, 4001, 4041 Market Street and 3979, 4025 Lockridge Street (12.22 acres). Bound by Mount Hope Cemetery on the west, Market Street on the north, light industrial buildings and single-family homes on the east, and Greenwood Mortuary and the Orange Line trolley on the south.

- **Site 5:** 720, 770, 885, 955, 960, and 995 Gateway Center Way (14.75 acres). Bound by Chollas Creek and SR 15 on the west, SR 94 on the north, commercial and light industrial uses on the east, and Costco on the south.



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CTAC Study Area and Potential Sites

Figure 4

- **Site 6:** 675 Gateway Center Drive and 3636 Gateway Center Avenue (12.68 acres). Bound by Costco on the west, commercial and light industrial uses on the north, Dennis Allen Park on the east, and Market Street on the south.

- **Site 7:** 4506 to 4586 Federal Boulevard and Federal/47th Street northwest corner (12.09 acres). Bound by Sunshine Berardini Field and I-805 on the west, industrial uses and Fairmount Avenue on the north, 47th Street on the east, and Federal Boulevard on the south.

A comprehensive analysis was completed for all seven potential sites, including a Title VI (of the Civil Rights of 1964 Act) and Social Equity Analysis. Extensive community engagement was also conducted by MTS to provide opportunities for the community and other stakeholders to participate in the site selection process (see Section Y for additional details on community engagement efforts for the project). On October 20, 2022, the MTS Board of Directors unanimously approved Site 7 as the preferred site for the project. This site was selected based on operational benefits, community impacts, impacts to low-income and environmental justice populations, constructability, acquisition cost, and tenant relocation requirements compared to the other six sites that were considered.

MTS has completed environmental review of the preferred site (Site 7) pursuant to the California Environmental Quality Act for the project and adopted a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program on October 20, 2022 via Resolution No. 22-14.

B. LOCATION

The proposed project is located in the central portion of the City of San Diego in western San Diego County, California (refer to Figure 1). The project site encompasses approximately 12.1 acres comprised of Assessor's Parcel Numbers (APNs) 541-611-04-00, -27-00, -31-00, -34-00, and -35-00. The site is located within the Ridgeview neighborhood of the Mid-City: City Heights community and occurs within an urbanized area primarily developed with industrial uses. It is bounded by Federal Boulevard to the south, 47th Street to the east, industrial uses and open space to the north, and industrial uses to the west (refer to Figure 2). Additional surrounding development includes industrial uses to the north and south; commercial retail, restaurants, and other commercial uses (e.g., automobile repair and cleaners) to the east; and an elementary school to the northeast. Residential uses occur beyond to the northeast, east, and southeast. I-805 is located approximately 0.25 mile to the west and SR 94 is located approximately 0.15 mile to the south. Chollas Creek is located approximately 300 feet to the north within the adjacent open space canyon. The City of San Diego's MHPA is located as close as approximately 150 feet to the north within the adjacent open space canyon as well. Sunshine Berardini Field lies on the north side of Chollas Creek, approximately 320 feet to the northwest.

The project site is entirely developed with industrial uses and contains nine one-to two-story buildings, paved surface parking, and limited ornamental landscaping. Topographically, the site varies with elevations ranging between 170 feet and 235 feet above mean sea level and a series of relatively level building pads separated by graded slopes between approximately five and 30 feet in height. Access is currently provided via seven curbs cuts along Federal Boulevard.

Figure 5, *Surrounding Land Uses*, shows the project site location and surrounding land uses within a half-mile radius.

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0 1,000 Feet

Source: Aerial (SanGIS, 2019)

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Surrounding Land Uses

Figure 5

C. METROPOLITAN PLANNING AND AIR QUALITY CONFORMITY

SANDAG, as the Metropolitan Planning Organization and the Regional Transportation Planning Agency for the San Diego region, is required by state and federal laws to develop and adopt a Regional Transportation Improvement Program (RTIP). The RTIP is a multi-billion-dollar, multi-year program of proposed major transportation projects in the San Diego region. The current adopted RTIP (2023 RTIP) covers fiscal years 2023 through 2027 and implements SANDAG's 2021 Regional Plan (which combines the Regional Transportation Plan [RTP], Sustainable Communities Strategy, and Regional Comprehensive Plan), the long-range transportation plan for the San Diego region. The SANDAG Board of Directors adopted the 2023 RTIP on September 23, 2022. The 2023 RTIP and its air conformity determination were approved by the U.S. Department of Transportation on December 16, 2022, which means that 2023 RTIP was determined to be in conformance to the applicable State Implementation Plans (SIP) in accordance with the provisions of 40 CFR Parts 51 and 93.

The project is not currently included in SANDAG's 2023 RTIP; however, the project would be in conformance with the applicable SIP based on the United States Environmental Protection Agency (USEPA) Transportation Conformity Regulations.

Title 40 CFR Section 93.126 provides a list of highway and transit project types that are exempt from the requirement to determine conformity. Project types included in this list may proceed toward implementation even in the absence of a conforming transportation plan and transportation improvement program. The project involves the construction of a new bus maintenance and storage facility, including administration and operation offices. Table 2, Exempt Projects, of Title 40, CFR 93.126 lists "construction of new bus or rail storage/maintenance facilities" under mass transit as being exempt from conformity requirements. Therefore, all air quality conformity requirements have been met, and the project would not conflict with implementation of the SIP.

D. LAND USE AND ZONING

Land Use/Zoning Designation Consistency

The project site is designated as Industrial Employment in the City of San Diego General Plan Land Use and Community Planning Element (City of San Diego 2015a) and Industrial in the Mid-City Communities Plan (City of San Diego 2015b) as Industrial. The site is also zoned Industrial (refer to Figure 4), including a designation of IL-3-1 (Industrial – Light) on the western portion of the site (west of the FedEx driveway) and IL-2-1 (Industrial – Light) on the eastern portion of the site (east of the FedEx driveway). These zoning classifications allow for a mix of light industrial, office, and commercial uses. The proposed project, as a bus maintenance, storage, and charging facility, would be consistent with the existing industrial community plan land use designation and zoning classification.

Land Use Compatibility

The project site is entirely developed with industrial uses and contains nine one-to two-story buildings, paved surface parking, and limited ornamental landscaping. Existing surrounding land uses immediately adjacent to the proposed project location include industrial uses to the north and south; commercial retail, restaurants, and other commercial uses (e.g., automobile repair and cleaners) to the east; open space directly adjacent to the proposed project area to the north; and an elementary school to the northeast. The elementary school, which is located east of 47th Street on Elm Street is not directly adjacent to the proposed project location. The elementary school is located approximately 200 feet to

the northeast of the project area. Residential uses occur beyond (not directly adjacent) to the northeast, east, and southeast. Chollas Creek and the City of San Diego's MHPA are located within the adjacent open space canyon to the north, with Sunshine Berardini Field further to the northwest. The project site is not located directly adjacent to the City's MHPA but is in close proximity to the MHPA (as close as approximately 150 feet) and thus is subject to compliance with the Land Use Adjacency Guidelines.

The project site is located in a developed urbanized area The site is currently designated, zoned, and developed with industrial uses that would be replaced with a new industrial use. The project would not result in a change in land use on the site or at surrounding properties. Moreover, the proposed project would be consistent with land use and zoning designations for the site, as discussed above. Therefore, the project would be compatible with existing surrounding land uses and no adverse effects related to land use would occur.

E. PRIME AND UNIQUE FARMLANDS

The project site is entirely developed and located within an urbanized area. According to the California Department of Conservation online Farmland Mapping and Monitoring Program, the project site is in an area that is designated as Urban and Built-Up Land, which is defined as land that is developed with urban uses of less than 40 acres and surrounded by developed uses (California Department of Conservation 2022). Implementation of the proposed project would not result in the conversion of any Prime or Unique Farmland, or Farmland of Statewide Importance since the site does not contain designated farmlands.

F. TRAFFIC AND PARKING IMPACTS

Traffic

The proposed project would not result in an increase in bus services but would provide bus transit infrastructure to accommodate existing and projected transit demands within the region. Provision of the proposed facility would be consistent with the goals of the 2021 Regional Plan (SANDAG 2021) of improving and enhancing the region's transit network as it would provide new transit infrastructure that would support the goal of an improved regional transit system and bolstering additional transportation mode choices to reduce reliance on the automobile and reducing regional emissions of criteria pollutants and greenhouse gas (GHG) emissions. Similarly, the project would be consistent with the goals of the City of San Diego General Plan Mobility Element (City of San Diego 2015c) to improve mobility through development of a balanced multi-modal transportation network, and to increase transit ridership and mode share through increased transit service accessibility, frequency, connectivity, and availability.

A Transportation Impact Study (TIS) was prepared for the project (VRPA Technologies, Inc. 2022) that analyzed local traffic conditions and associated transportation impacts potentially resulting from the project. The TIS is included as Appendix A and the results and conclusions are summarized below.

The TIS was prepared based on the methodology outlined in the *Guidelines for Transportation Impact Studies in the San Diego Region* (Institute of Transportation Engineers 2019). Roadway operations are typically rated in terms of level of service (LOS), ranging from LOS A (light traffic, minimal delays) to LOS F (heavy traffic, substantial delays). Generally, the target LOS for peak-hour intersection operations is D. Thus, an LOS A through D is considered desirable with no need for improvements. LOS E or F is an indication that improvements could be considered in order to achieve a desirable level of operations.

Traffic conditions were analyzed at five intersections in the project vicinity based on project trip generation and distribution, as well as their likelihood to be affected by project traffic, and included the following:

1. Federal Boulevard/47th Street
2. Federal Boulevard/Project Site East Driveway 1/1
3. Federal Boulevard/Project Site West Driveway 3/3
4. Federal Boulevard/Project Site West Driveway 2/3
5. Federal Boulevard/Project Site West Driveway 1/3

These intersections were analyzed under existing conditions and opening year conditions (2026) without and with the project. Traffic conditions for opening year (2026) without the project were based on 2022 traffic conditions increased by a growth factor of two percent per year. Opening year with the project conditions were evaluated by adding project traffic to the without project volumes.

The analysis assumed that separate right-turn lanes exist on the northbound, eastbound, and westbound approaches at the Federal Boulevard/47th Street intersection. This was done to reflect the width of these approaches, which allows right turns to move separately from through movements during heavier traffic conditions. These intersection approaches are considered to operate with "de facto" right-turn lanes in their current condition. No changes in lane geometry are considered necessary, and there are no plans to restripe the intersections to change the approaches to include designated right-turn lanes.

The opening year with project analysis assumed (1) a new traffic signal at the Federal Boulevard/Project Site West Driveway 1/3 intersection (study intersection 5) that is proposed as part of the project and (2) an overlapping right-turn phase (i.e., a right-turn arrow) for the eastbound movement at the Federal Boulevard/47th Street intersection. The overlap phase would be needed to maintain an LOS D or better conditions in the PM peak hour. This threshold is consistent with the *Guidelines for Transportation Impact Studies in the San Diego Region* (Institute of Transportation Engineers 2019), which is referenced in Sections 1.2 (Scope of TIS and Methodology) and 2.0 (CEQA Transportation Analysis) of the TIS. Furthermore, this threshold is also consistent with previous iterations of the City of San Diego's CEQA Significance Determination Thresholds before the new threshold was established, which now identifies VMT as the metric to determine impacts. The baseline intersection capacity analysis was calculated using the Highway Capacity Manual, 6th Edition, which is referenced in Section 3.0 (Baseline Traffic Conditions) of the TIS. The existing LOS for the Federal Boulevard and 47th Street intersection is LOS C during the AM peak hour and LOS D during the PM peak hour. The existing LOS for Federal Boulevard and Driveway 1/3 is LOS B for both the AM and PM peaks. This information can be found in Table 3-1 (Intersection Capacity Analysis Baseline Conditions) and Appendix C (Synchro Analysis). The installation of a right-turn overlap phase could be accomplished through modification of the traffic signal equipment without making changes to the roadway.

The TIS concluded that none of the analyzed intersections would operate at LOS E or F without the project under opening year conditions (under no build future conditions). For the Federal Boulevard and 47th Street intersection, the LOS is LOS C during the AM peak and LOS D during the PM peak for both the future (without project) and future (with project) conditions. For the Federal Boulevard and Driveway 1/3 intersection, the LOS is LOS B during the AM peak and LOS B during the PM peak for both the future (without project) and future (with project) conditions. Thus, the LOS does not change for either the future (without project) or future (with project) condition. This analysis is provided in Table 5-

1 of the TIS (Intersection Capacity Analysis, Future with Project – Peak Hour Intersection LOS). The addition of project traffic would not degrade the LOS or result in a substantial increase in delay or traffic congestion. Therefore, traffic conditions with the project are expected to be adequate and no off-site improvements are expected to be needed other than the traffic signal that is proposed as part of the project and the signal modification at Federal Boulevard and 47th Street. The roadway network has been designed for peak traffic conditions and the traffic levels associated with the project can be accommodated without exceeding the capacity of the roadway system.

Parking

The project would not displace on-street parking within the project area. During construction, some on-street parking along the project frontage of Federal Boulevard could temporarily be unavailable; however, these closures would be limited in duration (periodically for the duration of construction, which would be approximately 18 months) and would become available once the project is constructed such that no permanent loss of on-street parking would occur. The project site does not contain any public parking lots or structures. The eastern portion of the site consists of a gated surface parking lot containing approximately 150 private off-street parking spots for a business across the street, however, this parking lot is predominantly used for storage of buses and containers when they are not in use, and a staging area and field office for construction currently underway on the south side of Federal Boulevard. Employee parking on the south side of Federal Boulevard would be maintained during construction. Other surface parking areas are located on the western portion of the site associated with existing on-site businesses.

The project would include on-site surface and/or structured parking for approximately 250 buses, approximately 350 employee vehicles, and approximately 60 non-revenue vehicles (i.e., bus supervisor, relief, and maintenance vehicles). The number of parking spaces within the proposed facility would accommodate existing and projected future operations such that there would be no demand for off-site parking that could affect the existing on-street parking supply along Federal Boulevard or other nearby streets. Thus, project implementation would not result in the permanent loss of on-street or off-street public parking.

G. AESTHETICS

A FHWA Visual Impact Assessment (VIA) Scoping Questionnaire, as contained in Appendix C to FHWA Guidelines for the Visual Impact Assessment of Highway Projects (FHWA 2015), was completed for the project to determine the appropriate level of visual analysis for the project. The VIA Scoping Questionnaire, which is included as Appendix B, concluded that no additional visual analysis is required.

Scenic Vistas/Views

Scenic vistas are generally defined as public viewpoints that provide expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a general plan, but can also include locally known areas or locations where high-quality public views are available. Impacts to scenic vistas can result from development directly diminishing the scenic quality of the view or by blocking view corridors. The City of San Diego's General Plan (City of San Diego 2008a) and/or the Mid-City Communities Plan (City of San Diego 2015) do not identify or otherwise designate any scenic vistas, public viewpoints, view corridors, or protected viewsheds on the project site or adjacent areas in the project vicinity. The area surrounding the project site mostly consists of industrial development and transportation infrastructure.

Open space associated with Chollas Creek is located directly adjacent to the project site to the north. This area consists of a vegetated slope that transitions into a canyon where Chollas Creek extends in a generally northeast–southwest alignment. While not a designated scenic vista or resource, Chollas Creek is identified as an important natural and visual feature in the Natural and Cultural Resources Element of the Mid-City Communities Plan (City of San Diego 2015). Specifically, the Open Space section of the Natural and Cultural Resources Element includes a goal to "preserve and enhance Chollas Creek as a linear open space system to provide passive recreational opportunities, visual relief and biological habitat preservation."

The project would not encroach into the adjacent canyon or directly impact Chollas Creek. Proposed improvements would occur entirely within the developed project site. Moreover, the project would not block views of Chollas Creek from public vantagepoints in the project area, such as Federal Boulevard and Fairmount Avenue. Views across the site and into Chollas Creek from Federal Boulevard along the site frontage are not currently provided due to existing development and topography. While the existing buildings would be demolished, the project would include some site grading and construction of new buildings that would continue, along with topography, to obscure views down into the canyon where the creek runs. Brief views into the canyon and creek are provided along Federal Boulevard from areas to the west and from Fairmount Avenue to the north and northeast. Project implementation would not include features that would affect these existing views. Thus, the project would not result in a substantial adverse effect on a scenic vista.

Visual Character and Quality

The project site is located in an urbanized area primarily developed with industrial uses but is also adjacent to an open space area to the north that contains a hillside, canyon, and Chollas Creek. Implementation of the project would not substantially change the visual character of the site and surrounding area as it would replace existing industrial facilities with new industrial facilities at a similar development intensity within an industrial area. Proposed improvements would occur entirely within the developed site and would not encroach into the adjacent open space area.

The visual quality of the site would also be similar to the existing condition because the visual elements would not substantially change from the current conditions as discussed above. The site would remain an industrial use with new industrial buildings, operation areas, and parking. Project implementation may improve the visual quality of the site as the existing older buildings would be removed and new buildings would be constructed. The existing buildings have varying architectural styles, colors, features, and forms. The proposed buildings would have a more unified design compared to the existing buildings. Thus, removal of these buildings and development of new buildings would increase the visual unity of the site.

Light, Glare, and Shade

There are two primary sources of light: light emanating from building interiors that passes through windows and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear sky depending on the location of the light sources and its proximity to nearby light-sensitive areas.

The project site is located in a developed area with a mix of industrial and commercial development as well as adjacent open space. The existing light sources in the project area include streetlights and

vehicle lights along surrounding roadways, as well as from interior and exterior building lighting emanating from the existing buildings both on site and on the surrounding properties. There is also existing security lighting at the baseball fields in Sunshine Berardini Park to the north that contribute to existing ambient lighting. The proposed project would include the introduction of new lighting at a developed site with existing light sources. Proposed lighting is anticipated to include a combination of operational, street, and security lighting on the building's exterior and at charging stations and in parking areas. Proposed lighting would conform to the California Building Code, Title 24, as well as with Section 142.0740 of the City of San Diego Municipal Code that regulates outdoor lighting. Specifically, the City requires the use of certain types of light fixtures on non-residential properties in an effort to minimize the amount of light cast on adjoining properties, the public right-of-way, and into the night sky. External lighting would be used during nighttime hours. The proposed lighting would be similar to the existing project area lighting and would not introduce new and unique sources of light that would be substantial in relation to the existing lighting characteristics of the project area. Therefore, although the project would introduce new sources of light, since the sources are of similar nature to the surrounding land uses and the project would adhere to the applicable regulations, the project would not create a new source of substantial light which would adversely affect views in the area.

Glare impacts can occur because of artificial light or sunlight reflecting off a surface. Glare can create discomfort or present safety concerns (i.e., if glare is directed into the eyes of motorists). The project would comply with City of San Diego building code standards, including Section 142.0730 of the City of San Diego Municipal Code that regulates glare by allowing a maximum of 50 percent of the exterior of a building to be comprised of reflective material that has a light reflectivity factor greater than 30 percent. This regulation also prohibits use of reflective building materials where it is determined that such use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space. As such, the project would not create a new source of glare that would adversely affect views in the area.

Lastly, the project would not include large or tall structures that would result in extensive shading on surrounding properties. Proposed on-site structures would include one- to three-story buildings. While some shadows may be cast by proposed buildings, they would not substantially shade any adjacent outdoor use or open space areas, or adversely affect operations at surrounding industrial businesses.

H. AIR QUALITY

An air quality technical report was prepared for the project (HELIX 2022a) that evaluated potential air quality impacts resulting from project implementation. The report is included as Appendix C and the results and conclusions are summarized below.

The project would generate criteria pollutants in the short-term during construction and the long-term during operation. To determine whether a project would result in emissions that would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or have an adverse effect on human health, the project's emissions may be evaluated based on the quantitative emission thresholds established by the lead agency. MTS and SANDAG have not established specific numeric thresholds related to criteria air pollutants. This analysis relies on the quantitative emission thresholds adopted by the City of San Diego (City) since the project is located in the City. The air quality technical report concludes that emissions of criteria pollutants and ozone precursors from project construction and operations would not exceed the City's thresholds. Therefore, construction and operation of the project would not result in adverse air quality impacts.

The project is located within the San Diego Air Basin, which is designated nonattainment for ozone, attainment for both carbon monoxide (CO) and particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and unclassifiable/ attainment for particulate matter 10 microns or less in diameter (PM_{10}). Furthermore, the traffic analysis contained in Item F, *Traffic and Parking Impacts*, describes that there would be no adverse traffic impacts at affected intersections. Therefore, no CO hot spots would be created as a result of the project, especially since buses at the facility would be zero emission

I. HISTORIC AND CULTURAL RESOURCES

A Cultural Resources Survey Report was prepared for the project (HELIX 2022b), which included a records search at the South Coastal Information Center (SCIC), a Native American Heritage Commission (NAHC) search of the Sacred Lands File, a review of historic aerial photographs and maps, historic background research, a pedestrian survey, and an evaluation of historic built resources to determine the potential effects on historic and archaeological resources. Additionally, outreach and consultation with Native American tribes were undertaken by SANDAG. The cultural resources report is contained in Appendix D and the results and conclusions are summarized below.

The Area of Potential Effects (APE) is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist [36 CFR Part 800.16(d)]. Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. The consideration of direct effects and indirect effects may include, but are not limited to physical impacts, changes in visual, auditory, or seismic settings. The project APE also incorporates areas that could be affected by the extent of project-related ground disturbance.

The APE for the project coincides with the boundaries of the project site and consists of multiple parcels (APNs 541-611-04-00, -27-00, -31-00, -34-00, and -35-00), totaling approximately 12.06 acres. Of this area, approximately 9.65 acres are located north of Federal Boulevard and west of 47th Street and consists of the properties at 4506, 4514, 4550, and 4582 Federal Boulevard, and approximately 2.41 acres are located northwest of the intersection of Federal Boulevard and 47th Street and consists of a fenced-in parking lot. No work would occur on the adjacent FedEx facility located north of APN 541-611-27-00, including the driveway that is located between the western and eastern portions of the site, parcels located on the northern side of Federal Boulevard to the west of the project site, or on any parcels located on the southern side of Federal Boulevard. No staging areas or access routes are proposed to occur on areas outside of the APE.

The proposed APE also incorporates the vertical depth of disturbance that could be affected by the extent of the project. The depth of the vertical disturbance includes ground disturbance activities such as: Cast-In-Drill-Hole (CIDH) pile installation, excavation, backfill and grading up to a depth of approximately 30 feet to 50 feet on average for grading, with a maximum excavation of approximately 83 feet for CIDH pile installation. The height of the vertical extent of the APE is a maximum of approximately 50 feet and will consist of overhead charging stations, lighting, and two-story structures. A new traffic light will be installed on Federal Boulevard at the westernmost driveway of the proposed site.

The Sacred Lands Files search identified no presence of a Native American traditional cultural place(s) within the project area, and the SCIC record search identified 19 previously recorded resources within a half-mile radius of the project, none of which have been recorded within the project APE. Previously

recorded prehistoric resources consist of two lithic procurement and reduction areas, a low-density lithic scatter, and a shell scatter. No archaeological resources were observed during the field survey; however, the project site was covered by pavement and landscaping, and because of this, much of the original ground surface could not be observed. Based on the negative results of the Sacred Lands File search, limited number of prehistoric resources in the vicinity of the project, and the amount of past grading/disturbance within the APE, it is unlikely that subsurface prehistoric resources exist in the project APE.

The project site contains nine existing structures that would be demolished. These existing buildings appear to be older than 45 years and thus were evaluated for significance. None were recommended eligible for listing on the National Register of Historic Places or California Register of Historic Resources, or for designation by the City of San Diego Historic Resources Board. In addition, the project site is not within or adjacent to a designated Historic District.

Tribal consultation under the California Environmental Quality Act and Assembly Bill 52 was previously conducted for the proposed project in 2022. Input from the Tribes was requested on May 12, 2022 by email and on May 17, 2022 by mail based on the list of tribes that have requested notification of projects from SANDAG and the contacts provided by the NAHC. Four Tribes responded, with three requesting consultation based on the project area being within the Tribes' Area of Historic Interest. Tribes that requested consultation include the San Luis Rey Band of Mission Indians, San Pasqual Band of Diegueno Mission Indians, and the Viejas Band of Kumeyaay Indians. Consultation occurred with the San Pasqual Tribe, who requested that a Native American monitor (specifically Kumeyaay) be present during project construction. No further responses were received from the San Luis Rey and Viejas Tribes, despite attempts to initiate consultation with them. Due to the proximity of the Chollas Creek corridor and known habitation sites along the, MTS and SANDAG agreed to providing a Kumeyaay Native American Monitor during ground-disturbing activities.

In accordance with 36 CFR Part 800.4(a)(3), the FTA, MTS, and SANDAG contacted Native American tribes, local historic groups and other consulting parties. The FTA sent letters via email to Native American groups and individuals on February 22, 2023. Hard copies of the letters were sent to Native American tribes or individuals identified by the NAHC on February 23, 2023. Follow-up telephone calls were made in March 2023.

Communication regarding the project occurred with representatives of three tribes (Ewiiaapaayp Band of Kumeyaay Indians, Mesa Grande Band of Diegueno Mission Indians, and Jamul Indian Village). Representatives from the Ewiiaapaayp Band of Kumeyaay Indians stated in phone conversations on March 23, 2023, that, although they typically do not provide comments on projects that are outside of their property, the project area is in a heavily developed area and that they are not concerned about the project. On March 8, 2023, FTA received a letter from the Mesa Grande Band of Diegueno Mission Indians dated February 27, 2023, requesting their contact information to be updated on the NAHC list. In March 2023, SANDAG provided this information. On March 23, 2023, a representative from the Mesa Grande Band of Diegueno Mission Indians stated in a phone conversation that they did not have any questions about the project itself. During a virtual meeting with FTA and SANDAG on April 5, 2023, a representative from the Jamul Indian Village stated there is likely a village site near the general project area and requested that tribal cultural monitoring be incorporated into the project. SANDAG agreed to providing tribal cultural monitoring during ground-disturbing activities. SANDAG also agreed to providing updates about changes to design or location, and to follow up with additional information on procurement procedures.

Although no known cultural resources occur on site, archaeological and Native American monitoring would be conducted during project construction given the requests from some of the Tribes during the Native American outreach efforts. Should any archeological (cultural) resources or human remains be discovered during construction-phase ground-disturbing activities, all construction activities in the immediate vicinity of the find must stop until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and tribal monitor/consultant. If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource" or be of Native American origin, time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Federal Transit Administration and the NAHC and Public Resources Code (PRC) 5097.98 shall be followed. Pursuant to PRC Section 5097.98, if Native American remains are discovered, the remains shall be kept *in situ*, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

The FTA initiated consultation under Section 106 of the National Historic Preservation Act with the State Historic Preservation Officer (SHPO) on May 6th, 2023, requesting concurrence on the determination of no historic properties affected.

In a letter dated June 6th, 2023, the SHPO found FTA's delineation of the APE to be sufficient, concurred that the properties located at 4576, 4582, 4586, 4550, 4506, 4510, 4514, 4520, and 4570 Federal Boulevard are not eligible for the National Register of Historic Places, and concurred with the finding of no historic properties affected. The SHPO concurrence letter is included as Appendix E to this NEPA CE Worksheet.

J. NOISE

A noise impact report was prepared for the project (HELIX 2022c) that evaluated potential noise impacts resulting from project implementation. The noise report is included as Appendix F and the results and conclusions are summarized below.

Noise-sensitive land uses (NSLUs) in the project area include Webster Elementary School, approximately 200 feet northeast of the project site, and residences located as close as approximately 350 feet to the east on 48th Street. Residences are also located along 47th Street, south of Federal Boulevard, about 400 feet from the project site.

To characterize the existing noise environment and provide current baseline conditions, two short-term ambient noise measurements (15-minutes each) were conducted on April 27, 2022. One measurement location was located along the Federal Boulevard project frontage to characterize traffic noise, and the other measurement location was located near the open space area to the west to characterize ambient noise within the adjacent open space area north of the project site.

The primary existing noise source in the project area is traffic on the local roadways. FHWA Traffic Noise Model (TNM 2.5) was used to evaluate traffic-related noise conditions along the roadway segments in

the project vicinity. Existing traffic volumes in the project's TIS (VRPA Technologies, Inc. 2022) were used to assess the existing traffic noise impacts. Existing roadway CNEL levels are calculated based on 10 percent of average daily trips (ADT), which are the same as peak hour for the FTA criteria.

FTA provides construction noise criteria for residential (90 dBA L_{EQ} during the daytime and 80 dBA L_{EQ} during the nighttime), commercial (100 dBA L_{EQ} during the daytime and nighttime), and industrial (100 dBA L_{EQ} during the daytime and nighttime) receiving land uses. Construction of the project would require the use of heavy equipment that may be periodically audible at off-site locations. Noise levels would fluctuate depending on the construction activity, equipment type, and distance between noise source and receiver. Additionally, noise from construction equipment would vary dependent on the construction phase and the number and type of equipment at a location at any given time. Table 1 shows the anticipated construction noise levels for the proposed project.

Table 1
CONSTRUCTION NOISE LEVELS BY PHASE

Phase	Equipment Type	Equipment L_{MAX} at 50 feet	Composite L_{EQ} at 50 feet	Composite L_{EQ} at 110 and 350 feet[1]
Demolition	Concrete/Industrial Saw	89.6	84.6	77.8/67.7
	Excavator	80.7		
	Rubber Tired Dozer	81.7		
Site Preparation	Tractor/Loader/Backhoe	79.1	79.1	72.3/62.2
	Rubber Tired Dozer	81.7		
Grading	Rubber Tired Dozer	81.7	85.0	78.1/68.1
	Tractor/Loader/Backhoe	77.6		
	Grader	85.0		
	Excavator	80.7		
	Scraper	81.7		
Building Construction	Crane	80.6	83.7	76.8/66.8
	Forklift	80.6		
	Tractor/Loader/Backhoe	77.6		
	Generator	80.6		
	Welder	80.6		
Paving	Paver	77.2	77.2	70.4/60.3
	Roller	66.6		
	Paving Equipment	77.2		
Architectural Coating	Air Compressor	80.6	77.6	70.7/60.7

Source: HELIX 2022c

As shown, the loudest noise levels during construction (grading activities) at the nearest residential location (at a distance of 350 feet) are projected at 68.1 dBA L_{EQ}, which would not exceed the FTA's 90 dBA L_{EQ} daytime construction noise threshold for residential land uses. Noise levels also would not exceed the 100 dBA L_{EQ} construction noise threshold for commercial or industrial land uses at such nearby uses. Therefore, no adverse construction noise impacts would occur. Additionally, standard avoidance measures would be implemented such as conducting construction activities during weekday daytime hours (7 AM to 7 PM) in accordance with City of San Diego Municipal Code Section 59.5.0404.

FTA provides operational noise impact thresholds for three categories of NSLUs. Category 1 includes land uses in which quiet is an essential element, such as outdoor amphitheaters, outdoor pavilions,

outdoor historical landmarks, recording studios, and concert halls. Category 2 includes residences and buildings where people sleep such as homes, hospitals, and hotels. Category 3 includes institutional land uses primarily used during the day and evening, such as schools, libraries, theaters, and churches. The FTA's operational noise criteria are based on existing noise exposure and the level of impact is categorized as either No Impact, Moderate Impact, or Severe Impact, depending on the noise exposure from project-generated noise. For the purpose of this analysis, a substantial adverse impact is assessed if noise levels exceed the FTA severe impact threshold.

The portion of Federal Boulevard west of 47th Street consists of industrial uses, which are not considered a NSLU by FTA thresholds. The northern portion of 47th Street borders Webster Elementary School, a Category 3 site, while the southern portion of 47th Street and eastern portion of Federal Boulevard border residential properties, which are Category 2 sites.

Based on the TIS (VRPA Technologies, Inc. 2022), the project would generate 2,090 ADT, including 1,590 ADT by employees and 500 ADT by buses. It should be noted that bus trips related to the project would include electric buses, which are not currently available in the FHWA TNM. Therefore, the modeling assumed standard diesel bus engines, which are louder than the electric buses that would operate at the project site. As such, the analysis of noise generation related to buses is conservative. Table 2 provides a comparison of project-generated traffic noise and the applicable FTA thresholds. Project Noise Impact Criteria Presentation is used per the FTA Transit Noise and Vibration Impact Assessment Manual since the project is a new source of transit noise in the community. This does not represent a cumulative effect, but rather the project's incremental effect.

Table 2
RECEPTOR NOISE LEVELS DURING CONSTRUCTION

Receptor/ NSLU	Approximate Nearest Distance	Project Peak Temporary Construction Noise Level (dBA)[1]	FTA Impact Threshold of No Impact (Construction)	Project Impact Level
Webster Elementary School (Category 3)	200 ft	Between 67.7 L_{EQ} and 77.8 L_{EQ}	90 dBA L_{EQ} during the daytime and 80 dBA L_{EQ} during the nighttime	No Impact
Residences on 48th Street (Category 2)	350 ft	67.7 dBA L_{EQ}	90 dBA L_{EQ} during the daytime and 80 dBA L_{EQ} during the nighttime	No Impact
Residences on 47th Street south of Federal Boulevard (Category 2)	400 ft	Less than 67.7 dBA L_{EQ}	90 dBA L_{EQ} during the daytime and 80 dBA L_{EQ} during the nighttime	No Impact

Source: FTA 2018; TNM 2.5

34 Noise levels represent both peak hour L_{EQ} (applicable to Category 3 thresholds) and L_{DN} (applicable to Category 2 thresholds).

dBA = A-weighted decibels; L_{EQ} = time-averaged noise level; FTA = Federal Transit Administration

As shown, project-generated noise near NSLUs would be within the No Impact category of the applicable threshold on the analyzed NSLUs. The project would also not result in a substantial increase in ambient noise levels, and no adverse noise impacts would occur upon project implementation.

Although the project site would be adjacent to the MHPA, at times equipment may be in use over 1,000 feet from the MHPA boundary. However, for the purposes of this analysis, construction equipment is assumed to be located approximately 110 feet away from the MHPA. At a distance of 110 feet, if used simultaneous near the edge of habitat, equipment could generate an hourly combined average noise level of 78.1 dBA LEQ. The use of construction equipment during the demolition and grading would therefore potentially exceed the allowable 60 dBA LEQ and existing ambient noise levels at the edge of the MHPA. Removal of the pavement for existing foundations may also be required. This is considered to have a potentially significant impact at the edge of the MHPA. Temporary sound attenuation barriers consisting of a single, solid sound wall, with a height of 12 feet at the northern edge of the project site that borders the MHPA area would bring the project into compliance with MHPA noise regulations

during construction activity. The sound attenuation barriers would need to be constructed of commercial noise control materials with a manufacturer's laboratory test rating such as noise control blankets or solid materials such as masonry, wood, plastic, fiberglass, steel, hay bales or a combination of those materials meeting Sound Transmission Class 22 specifications.

The project would involve the maintenance and storage of electric buses and associated office buildings. At slow speeds (10 mph or less) which would be typical of bus movement at the project site, the bus noise would be nearly imperceptible with only low-level noise from the buses' air conditioning and air compressors. Stationary operational noise from stationary sources would occur at exterior building locations around the project site. Known or probable site noise sources include large power supply transformer(s) for the bus charging systems; building rooftop heating, cooling, and air conditioning (HVAC) systems; maintenance air compressors and impact wrenches; wash facilities and blow-off dryers; and a backup power generator to maintain bus charging in the event of a power outage. Estimated noise levels for these units at 50 feet are summarized in Table 3, Operational Stationary Noise Generation at 50 Feet.

Table 3
OPERATIONAL STATIONARY NOISE GENERATION AT 50 FEET

Noise Source	Exterior Noise Level at 50 feet (dBA)
Transformer	52.7
HVAC (per unit)	50.2
Impact Wrench (short-term use)	85
Air Compressor	65
Bus Washer and Dryer	85
Backup Power Generator (Class II Noise Control Enclosure)	71

The operational sources have the potential to create noise in excess of both the MHPA noise limit of 60 dBA LEQ or existing ambient noise levels and the City's industrial exterior noise limit of 75 dBA LEQ (day and night) at the property boundary. The potential noise impacts from site operations are considered potentially significant. However, an Operational Noise Control Plan, which reduces operational noise to 60 dBA or existing ambient noise levels at the MHPA boundary and to 75 dBA at surrounding industrial property lines, shall be prepared and submitted for approval with the final project plans for the building permits. Required noise reduction measures may include sound barriers around the project site or around individual pieces of equipment. MTS shall approve and implement this plan, which will reduce noise levels at the MHPA boundary and surrounding property lines to comply with applicable regulations.

K. VIBRATION

Construction of the project would include the use of a vibratory compaction roller and has the potential to result in temporary vibration impacts to structures and humans. Based on the anticipated development footprint on the project site, compaction activities would not occur closer than 50 feet to the nearest off-site structures. Other construction activities would be less intensive than compaction and would produce less vibration. Therefore, calculated vibration levels from compaction are considered conservative. Operation of a vibratory compactor would create approximately 0.21 inch per second peak

particle velocity (PPV) at a distance of 25 feet. At 50 feet, the compactor would create 0.098 PPV.[4] This would be lower than what is considered the damage criteria of 0.3 inch per second PPV for engineered concrete and masonry structures by the FTA (FTA 2018). Therefore, although a vibratory roller may be perceptible to nearby human receptors, temporary impacts associated with the roller and other potential construction equipment would not be substantial or adverse.

The project does not include operational components that would generate substantial vibration. FTA guidance (FTA 2018) does not require further vibration analysis for projects that involve rubber-tire vehicles and do not include indoor operation, roadway irregularities, or vibration sensitive research facilities. Therefore, no vibration impacts would occur as a result of project implementation.

L. ACQUISITIONS AND RELOCATIONS REQUIRED

The project site includes a total of five parcels privately owned by separate entities, including Loan Oak – San Diego III LLC, Bayshore Group, Robert L Little, H&H Investment Co., and Airtouch Cellular – San Diego LF H&H Investment Co. Project implementation would require acquisition of all five parcels by MTS. Table 3 below identifies the parcels within the project site, parcel size, current property owners, and current uses/tenants.

Table 4
PROJECT SITE PROPERTY SUMMARY

APN	Parcel Size (acre)	Current Property Owner	Current Use/Tenant
541-611-27-00	2.41	Lone Oak – San Diego III LLC	Surface parking for Crest Distributing across Federal Boulevard.
541-611-31-00	1.35	Bayshore Group	Occupied by Distribution International with truck loading and storage facilities.
541-611-04-00	5.45	Robert L Little	Various industrial uses occupied by City Link Trucks storage, H&H Diversified Investment Company, All Pro Stickers, Cal Auctions, and San Diego Scale Company.
541-611-34-00	2.84	H&H Investment Co.	Contains Antonio Metal Works and two abandoned/vacant buildings with boarded/broken windows.
541-611-35-00	0.04	Airtouch Cellular – San Diego LF H&H Investment Co.	Paved area part of development on the above parcel.

No residences would be displaced as no housing exists on the site. The nine existing on-site buildings would be demolished, some of which are currently occupied by industrial businesses, including Distribution International, City Link Trucks, H&H Diversified Investment Company, All Pro Stickers, Cal Auctions, San Diego Scale Company, and Antonio Metal Works. These businesses would be displaced as a result of the project. Relocation assistance for affected businesses would be provided, as required, in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (42 United States Code [USC] 4601). Due to the small number of businesses, and small number of employees at each business, and since relocation assistance will be provided, these relocations are not considered

[4] Equipment PPV = Reference PPV * $(25/D)^n$ (in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013.

significant. There are many other industrial sites in San Diego for businesses with this amount of space requirement to be relocated to.

The project site contains several existing utility, roadway, and open space easements. An existing roadway easement adjacent to and west of the FedEx driveway, as well as various SDG&E utility easements within the site, would be vacated. An existing open space easement occurs along the northern site boundary would remain and the project would not encroach into this easement. Other utility easements within the site would also remain. No new temporary or permanent easements would be required.

M. HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment (ESA) was conducted for the project site (Allied Geotechnical Engineers 2022a), which is included as Appendix G. The results and conclusions of the Phase 1 ESA are summarized below.

The Phase 1 ESA concluded that the project site has been developed with industrial uses since the 1950s. No documented unauthorized releases of hazardous materials are known to have occurred at the project site. However, an unpermitted/unregulated burn ash facility[5] may have operated on the project site during the 1930s and early 1940s, either where the existing surface parking lot is located (east of the FedEx driveway) or on the parcel just west of the FedEx driveway. Hazardous materials associated with burn ash can include high concentrations of metals including lead, dioxins, and chlorinated hydrocarbons. While it is anticipated that the burn ash was removed during grading and development of the existing on-site and surrounding uses, there is potential to encounter burn ash during project construction.

As such, a Phase II ESA would be required as a condition of approval and would be conducted as part of the property acquisition process and before construction. Prior to the start of demolition and earthwork activities, a Phase II ESA shall be conducted to include collection and analysis of soil and groundwater samples to determine the presence or absence of hazardous substances, including but not limited to heavy metals, hydrocarbons, and burn ash. If hazardous substances are determined to be present on site above regulatory limits (i.e., threshold limit concentrations) as established from the California Code of Regulations, Title 22, Section 66261.10 et seq. and the CFR, Title 40, Section 261.24, a remediation plan will be prepared. The remediation plan will incorporate recommendations identified in the Phase II ESA and associated remediation activities (e.g., excavation and disposal of contaminated soil or in-situ treatment of contaminated soil) required to reduce concentration levels to below the regulatory limits. The remediation plan will be reviewed and approved by the County of San Diego Department of Environmental Health and Quality and implemented prior to the commencement of construction.

The Phase II ESA would entail collection of subsurface soil and groundwater (if encountered) samples from up to 11 locations within the site in the vicinity of those locations identified in Figure 6, *Sampling Locations*. From each borehole, three soil samples would be collected from a depth of (1) zero to two feet (for surface contamination and heavy metals), (2) two to four feet (for surface contamination and heavy metals), and (3) five to ten feet (for old landfill materials). One groundwater sample would also be

[5] A burn ash facility is a site where solid waste has been burned at low temperature and the residual burn ash and debris have been landfilled or stockpiled.

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Source: ALLIED GEOTECHNICAL ENGINEERS, INC, 2023.

HELIX Environmental Planning

Sampling Locations

Figure 6

collected from each borehole if encountered. Samples obtained from the borings will be delivered to an approved analytical testing laboratory, which is anticipated to include:

- Total Petroleum Hydrocarbon as gasoline; benzene, toluene, ethylbenzene, and xylenes (BTEX) and methyl tertiary butyl-ether (MTBE) (USEPA 8015 & 8021); Oil and Grease Compounds (USEPA 1664)
- Title 22 metals (total threshold limit concentration [TTLC] and soluble threshold limit concentration [STLC]);
- Hexavalent chromium;
- Toxicity Characteristic Leaching Procedure (TCLP) using USEPA Method 1311;
- Hydrogen ion index (pH) by USEPA Method 9045D;
- Herbicide by USEPA Method 8151A – Acifluorfen, Bentazon, Chloramben, 2,4-D, Dalapon, 2,4-DB, DCPAdiacid, Dicamba, 3,5-Dichlorobenzoic acid, Dichloroprop, Dinoseb, MCPA, MCPP, 4-Nitrophenol, Pentachlorophenol (PCP), 2,4,5-T (2,4,5-Trichlorophenoxyacetic acid), 2,4,5-TP, Picloram, DCAA; and
- Pesticide by USEPA Method 8181A – Aldrin, alpha-BHC, beta-BHC, gamma-Chlordane, alpha-Chlordane, 4,4´-DDD, 4,4´-DDE, 4,4´-DDT, delta-BHC, Dieldrin, Endosulfan I, Endosulfan II, Endosulfan sulfate, Endrin, Endrin aldehyde, Endrin ketone, gamma-BHC, Lindane, Heptachlor, Heptachlor Epoxide, Methoxychlor, Toxaphene, Chlordane (total), Decachlorobiphenyl.

The testing will be performed in two phases. Testing for STLC and TCLP will only be performed on soil samples with total metal concentrations which exceed the TTLC values and/or more than ten times the STLC values set by USEPA. The results of the analytical laboratory tests will be analyzed in general accordance with USEPA Test Methods for Evaluating Solid Wastes (SW-846). The results of the Phase 2 ESA will be presented in a summary of findings and is anticipated to address the following:

- Characterization of the limits and potential impact of hazardous material contamination beneath the project site;
- Recommendations for options to mitigate the risks (if applicable); and
- In the event that contaminated soils and/or groundwater are encountered, an evaluation and estimate of tonnage of contaminated soils/groundwater, non-Resource Conservation and Recovery Act (RCRA) hazardous or RCRA, as applicable, which will be generated during construction, will be provided. Recommendations for testing, sampling, handling, and temporary safe storage of contaminated soils and/or groundwater will also be provided.

Furthermore, as a construction best management practice (BMP), the construction contractor would prepare a Community Health and Safety Plan and a Soil Management Plan prior to the start of demolition and earthwork activities to address the monitoring, testing, and handling of heavy metal- and hydrocarbon-contaminated soil or groundwater and burn ash, if encountered during construction activities.

The project site contains nine existing buildings that would be demolished. Due to the age of these buildings (ranging from approximately 35 to 70 years), the potential exists for them to contain asbestos

and/or lead-based paint and thus, demolition activities could potentially release these hazardous building materials into the environment. Prior to demolition, an asbestos and lead survey would be conducted on the project site by a licensed asbestos/lead contractor. If the survey identifies hazardous building materials, the necessary remediation identified in the survey would be completed prior to commencement of demolition activities in accordance with applicable laws, including Occupational Safety and Health Administration (OSHA) guidelines, to ensure that no hazards to the demolition crew or others are created by exposure to hazardous building materials.

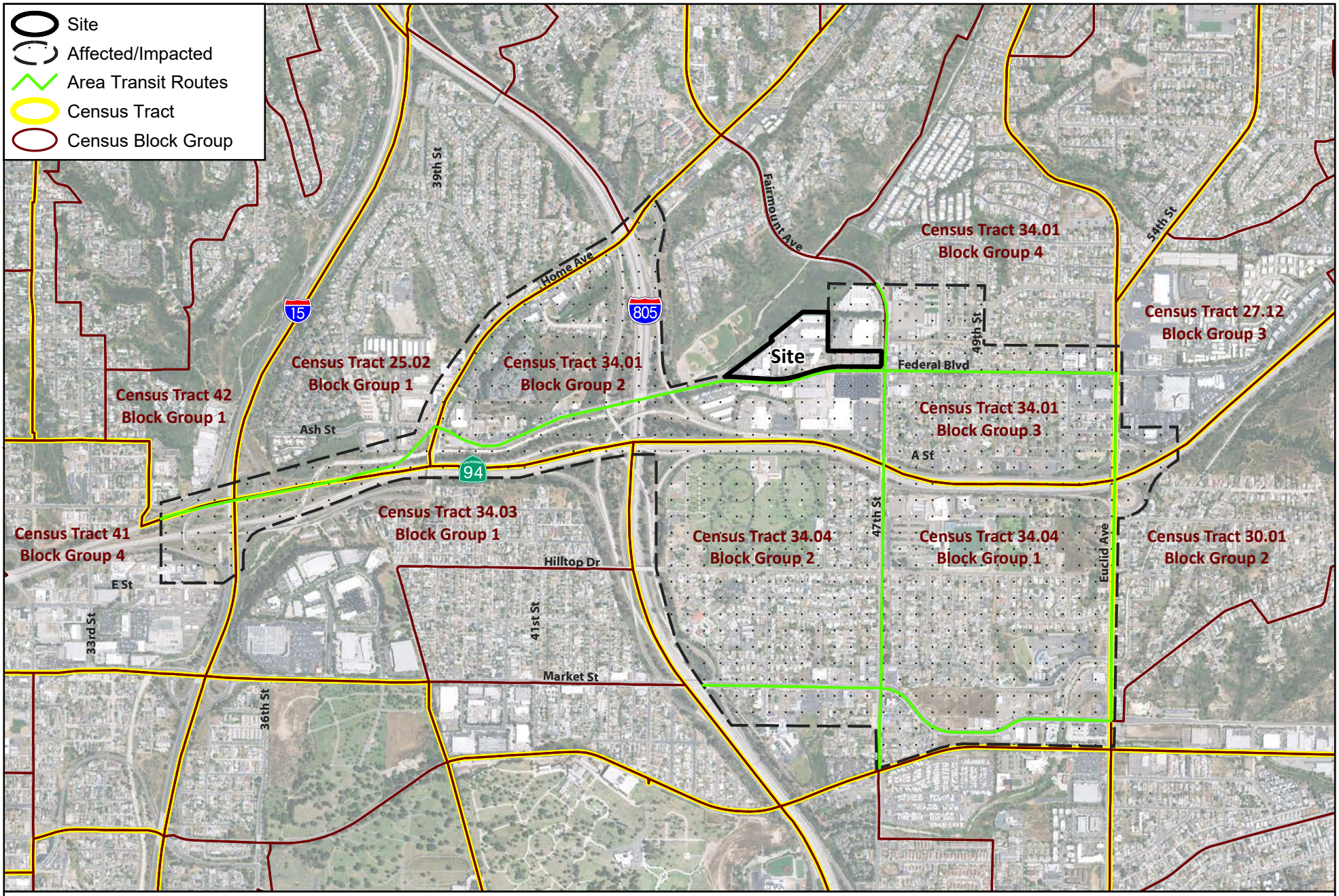
During the construction period, there is also the possibility of accidental release of hazardous substances such as spilling of hydraulic fluid or diesel fuel associated with construction equipment and maintenance. The level of risk associated with the accidental release of these hazardous substances is not considered adverse due to the small volume and low concentration of hazardous materials. The construction contractor would be required to implement standard construction controls and safety procedures to avoid or minimize the potential for accidental release of such substances into the environment.

Project operations would involve bus maintenance activities that use hazardous materials; however, future operations at the project site would be required to comply with applicable local, state, and federal regulations related to the transport, handling, and usage of hazardous materials. Further, the bus fleet at the facility would be all electric and would involve the use of rechargeable vehicle batteries. Proper battery maintenance, storage, and charging protocols in accordance with applicable regulations governing lithium batteries would be followed to avoid risks (such as hazardous waste exposure, fires, or explosions) to on-site employees and people in the surrounding area. Such protocols would in compliance with the Universal Waste Management Standards (Title 40 CFR Part 273) and include, but are not limited to, storage of spare batteries within insulated and temperature-controlled enclosures, electrical charging monitoring systems to prevent overcharging, regular inspection of batteries (both within buses and spares in storage), and proper handling and transport of batteries to be disposed.

N. COMMUNITY DISRUPTION AND ENVIRONMENTAL JUSTICE

Socioeconomic Profile

The socioeconomic study area was determined by the area likely to be potentially impacted by construction and operational effects of the proposed project. The study area also captures the transit routes as buses travel to and from the public transit corridors along Federal Boulevard, Market Street, 47th Street, and Euclid Avenue; and along the major transportation corridors including I-805, SR 15, and SR 94. Using GIS mapping and census data, eight census tracts (CT; Figure 7) were identified in the socioeconomic study area, including the CT the project site is located within (CT 34.01) and seven addition CTs in the project area (CTs 25.02, 27.12, 30.01, 34.03, 34.04, 41, and 42). The study area is urbanized and developed primarily with industrial uses along with a mixture of commercial, residential, and institutional land uses. The demographic profile of the population within the socioeconomic study area and comparative estimates for the San Diego Region (San Diego County) in terms of ethnicity, housing, and income are provided below in Tables 4 through 6.



TTG ENVIRONMENTAL

Figure 7 - Census Tracts

Table 5
ETHNICITY BY CENSUS TRACT COMPARED TO SAN DIEGO REGION
(Percentage of the Population)

Ethnicity	Census Tract								San Diego Region
	25.02	27.12	30.01	34.01	34.03	34.04	41	42	
American Indian	1%	<1%	1%	<1%	<1%	<1%	<1%	<1%	<1%
Asian & Pacific Islander	7%	10%	5%	15%	3%	10%	6%	4%	11%
Black	7%	26%	33%	32%	7%	15%	10%	4%	5%
Hispanic	47%	44%	41%	32%	68%	63%	35%	26%	34%
White	33%	16%	17%	19%	19%	9%	46%	59%	46%
All Other	5%	4%	3%	2%	3%	3%	3%	7%	4%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%	100%
Total Minority	67%	84%	83%	81%	81%	91%	54%	41%	54%

Source: SANDAG 2023a, 2023b, 2023c, 2023d, 2023e, 2023f, 2023g, 2023h, 2023i

Table 6
HOUSING UNITS BY CENSUS TRACT COMPARED TO SAN DIEGO REGION
(Percentage of the Population)

Housing Type	Census Tract								San Diego Region
	25.02	27.12	30.01	34.01	34.03	34.04	41	42	
Single Family -Detached	70%	30%	91%	54%	70%	46%	23%	84%	50%
Single Family – Attached	9%	3%	9%	5%	22%	38%	17%	8%	10%
Multi-Family	21%	53%	0%	32%	8%	16%	60%	8%	37%
Mobile Home and Other	0%	14%	0%	9%	0%	0%	0%	0%	3%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%	100%

Source: SANDAG 2023a, 2023b, 2023c, 2023d, 2023e, 2023f, 2023g, 2023h, 2023i

Table 7
AVERAGE ANNUAL HOUSEHOLD INCOME BY CENSUS TRACT COMPARED TO SAN DIEGO REGION
(Percentage of the population)

Annual Household Income[1]	Census Tract								San Diego Region
	25.02	27.12	30.01	34.01	34.03	34.04	41	42	
Less than $15,000	12%	27%	2%	8%	7%	11%	5%	5%	9%
$15,000 to $29,999	14%	19%	11%	16%	20%	20%	16%	8%	11%
Total Less than $30,000	24	46%	13%	24%	27%	31%	21%	13%	20%
$30,000 to $44,999	16%	14%	18%	16%	23%	19%	21%	7%	12%
$45,000 to $59,999	14%	9%	10%	17%	13%	16%	15%	6%	11%
$60,000 to $74,999	12%	5%	12%	10%	10%	8%	10%	8%	10%
$75,000 to $99,999	12%	9%	19%	13%	10%	10%	12%	17%	14%
$100,000 to $124,999	7%	10%	10%	13%	9%	5%	10%	21%	11%
$125,000 to $149,999	3%	3%	7%	2%	2%	2%	3%	6%	6%
$150,000 to $199,999	4%	3%	6%	2%	3%	4%	4%	9%	7%
$200,000 or more	5%	2%	5%	3%	3%	6%	5%	13%	10%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%	100%
Median Household Income	$52,743	$34,423	$71,275	$53,578	$44,699	$45,000	$53,252	$97,313	$71,414

*Adjusted for inflation (2010 $)

Source: SANDAG 2023a, 2023b, 2023c, 2023d, 2023e, 2023f, 2023g, 2023h, 2023i

In general, the study area has a higher minority population percentage compared to the regional average of 54%. Six of the study area CTs have a minority population percentage higher than the overall San Diego region, ranging from 67% to 91%. One (CT 41) has the same minority population percentage as the regional average, and one (CT 42) has a lower minority population percentage of 41%.

Regarding housing types, five of the CTS within the study area (CTs 25.02, 30.01, 34.03, 34.04, and 42) are predominantly characterized by single-family homes. Multi-family residences comprise the majority of housing types within two CTs (CTs 27.12 and 41), and mobile homes and other housing types only occur in two CTs (27.12 and 34.01).

The study area largely has a lower median household income compared to the regional average ($71,414) with six CTs ranging from $34,423 to $71,275. One CT (30.01) has a very similar median household income ($71,275) to the regional average, and one (CT 42) is substantially higher at $97,313.

The study area also has higher levels of poverty compared to regional averages. The U.S. Department of Health and Human Services 2023 Poverty guidelines identify the poverty threshold as below $30,000 for a family of four (U.S. Department of Health and Human Services 2023). Six of the CTs within the study area (CTs 25.02, 27.12, 34.01, 34.03, 34.04, and 41) have a median household income with a higher percentage of households below the poverty threshold compared to the region (20%).

In addition, people within the study area have an average median age ranging between 29.1 to 43.9 years. Five CTs (CTs 25.02, 27.12, 30.01, 34.03, and 34.04) have a median age lower than the regional average of 37.4 years, and three CTs (CTs 34.01, 41, and 42) have a higher median age than the regional average.

Community Cohesion

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. The project would occur on a developed site already served by existing roadways and utility infrastructure. No new major supporting infrastructure facilities would need to be constructed and/or extended to the project site that could result in a physical disruption to an established land use or the local pattern of development. (See the discussion on Land Use above for additional information on consistency with land uses).

Community Character

The project site is within the Ridgeview neighborhood of the Mid-City: City Heights community in the central portion of the City of San Diego. The project site and vicinity are in a developed urbanized area and surrounded primarily by industrial uses. An open space canyon that contains Chollas Creek is adjacent to the project site to the north, with residential development across the canyon to the north. Additional surrounding development includes land uses typical of an urban environment: industrial uses to the north and south; commercial retail, restaurants, and other commercial uses (e.g., automobile repair and cleaners) to the east; and an elementary school to the northeast. Residential uses occur beyond to the northeast, east, and southeast. Freeways are located in close proximity—I-805 is located approximately 0.25 mile to the west and SR 94 is located approximately 0.15 mile to the south.

The project would replace existing on-site industrial uses with a new industrial use. Existing buildings on the site would be demolished and new buildings and electrical bus charging and parking facilities would be constructed. The new buildings would be similar to the existing on-site development pattern in terms of mass, scale, and lot coverage. Like the current condition, the buildings would be constructed in only a portion of the site with parking on other portions of the site. The new buildings and facilities would be designed with a unified style that would provide a cohesive development. Site grading and retaining walls would be required but the physical changes to the project site would not substantially modify overall landforms and topography within the project vicinity. Thus, project implementation would not add new features that would be obtrusive or incompatible with existing land uses.

Disruption of Community Activities or Uses

The project would not disrupt any community activities or community uses. The proposed facility is intended to improve transit system operations, which would be beneficial to the community. Buses and employees traveling to and the from the site would not substantially increase traffic congestion on local roadways such that access to nearby activity centers or recreational facilities would be impeded or disrupted (refer to Item F). Additionally, the project would not create excessive noise, objectional air emissions, or hazardous conditions that would adversely affect people at nearby parks or community activity centers (refer to Items J, H, and M, respectively). Access and use of such facilities in the project area would not be impeded or disrupted by construction or operation of the project. The project would be consistent with existing uses and would not disrupt community activities.

Environmental Justice

All projects involving a federal action (funding, permit, or land) must comply with Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* and EO 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*. This EO directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. It should be noted that, according to the Council on Environmental Quality: "under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population." Subsequent to issuance of EO 12898, the US Department of Transportation (DOT) issued DOT Order 5610.2(a), *Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, to implement the EO 12898. The DOT Order describes the process DOT and its administrations use to incorporate environmental justice (EJ) principles into programs, policies, and activities.

FTA Circular 4703.1, *Environmental Justice Policy Guidance for Federal Transit Administration Recipients*, provides guidance to agencies on how to implement the EJ principles included in EO 12898 and DOT Order 5610.2(a). FTA Circular 4703.1 emphasizes that the guiding EJ principles followed by DOT and FTA are briefly summarized as follows:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.

- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The following definitions, set forth in FTA Circular 4703.1, are utilized in the EJ analysis contained in this section:

- *Disproportionately high and adverse effect on minority populations and low-income households* means an adverse effect on human health or the environment that is (1) predominantly borne by a minority population and/or low-income household or (2) will be suffered by the minority population and/or low-income household and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income households.

- *EJ population* means low-income households and/or minority populations.

- *Adverse effect* means the totality of the significant, harmful individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include but are not limited to:

    - Bodily impairment, infirmity, illness, or death;
    - Air, noise, and water pollution and soil contamination;
    - Destruction or disruption of man-made or natural resources;
    - Destruction or diminution of aesthetic values;
    - Destruction or disruption of community cohesion or a community's economic vitality;
    - Destruction or disruption of the availability of public and private facilities and services;
    - Vibration;
    - Adverse employment effects;
    - Displacement of persons, businesses, farms, or non-profit organizations;
    - Increased traffic congestion, isolation, exclusion or separation of individuals within a given community or from the broader community; and
    - The denial of, reduction in, or significant delay in the receipt of benefits of DOT programs, policies, or activities.

EJ analysis was conducted for the socioeconomic study area in accordance with related federal and state laws and guidance. The following discussion compares the San Diego region to the population within the CTs within the study area, both individually and aggregately. Communities that exhibit a greater

minority population and/or lower incomes than the region as a whole are typically considered to be EJ communities.

Per data presented in Tables 4 through 6 (refer to Socioeconomic Profile section above), the San Diego regional population overall is approximately 34% Hispanic; of non-Hispanics, 11% are Asian and Pacific Islander, 5% are Black, less than 1% are American Indian, 4% are other minorities, and 46% are White. The total minority population is approximately 54% (refer to Table 4). By comparison, the Hispanic population within six of the eight CTs in the project socioeconomic study area is above the regional average, ranging from 35% to 68%. The Black population is higher within seven of the eight CTs in the socioeconomic study area compared to the regional average (5%). The Asian and Pacific Islander population is lower than the regional average (11%) within all eight CTs in the study area. Other ethnic populations are lower within five CTs, the same within one CT, and higher within two CTs in the study area.

The total minority population is higher than the regional average of 54% in six of the CTs within the study area, ranging from 67% to 91%. CT 41 has the same minority population percentage as the regional average of 54%, and the minority population percentage in CT 42 (41%) is lower than the regional average. The overall aggregate minority population percentage within the socioeconomic study area (calculated by averaging the ethnicity populations of all eight CTs) is 70%, which is higher than the regional average.

San Diego County's median annual income is approximately $71,414 (refer to Table 5). Approximately 20 percent of the regional population had annual household incomes below $30,000. Table 4 shows that annual household incomes below $30,000 were more common for the study area (six of the CTs had a higher percentage and two CTs had a lower percentage) than in the San Diego region as a whole. In the project CTs overall, the percentage with annual household incomes below $30,000 was approximately 24 percent, compared to 20 percent for the San Diego region.

As summarized in Table 7, the socioeconomic study area as a whole, as well as seven of the eight individual CTs in the study area, would be considered EJ communities due to the presence of higher minority populations and/or lower median annual incomes relative to the region overall.

Table 8
ENVIRONMENTAL JUSTICE POPULATIONS BY CENSUS TRACT

Geographic Area	Minority Percentage	Percentage with Low Median Income[1]	Environmental Justice Population
San Diego Region	54	20	-
Socioeconomic Study Area	70	24	Yes
CT 25.02	67	26	Yes
CT 27.12	84	46	Yes
CT 30.01	83	13	Yes
CT 34.01	81	24	Yes
CT 34.03	81	27	Yes
CT 34.04	91	31	Yes
CT 41	54	21	Yes
CT 42	41	13	No

[1] Annual household income below $30,000 was used as poverty threshold pursuant to U.S. Department of Health and Human Services 2023 Poverty Guidelines.

The analysis examined the following concerns during construction:

- Temporary noise increases, air pollutant emissions (dust generation and diesel emissions), lighting impacts during nighttime construction hours (if required but not anticipated), and visual changes to the existing landscape;
- Pedestrian, bicycle, and transit delays; detours; and reduced access during construction;
- Traffic congestion and detours on local roadways and freeways; and
- Brief interruptions in utility service where connections would be required.

Short-term construction-related impacts would be minimized to the extent possible and would not affect minority populations and/or low-income households in an "appreciably more severe or greater magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income households." (FTA Circular 4703.1.)

Implementation of the project would require property acquisition, but no housing or residents would be displaced. Acquisition and relocation activities would be carried out in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended), Title 49 CFR, Part 24. Since there are no adverse impacts, then minority populations and/or low-income households would not experience impacts that are appreciably more severe or greater magnitude than those experienced by the non-minority population and/or non-low-income households. Accordingly, the project would not cause disproportionately high and adverse effects on minority or low-income EJ populations.

In addition, the local community, including EJ populations could also experience the following benefits:

- Improved bus transit service operations by providing on-time transit service for riders in the Encanto, Mid-City, and Southeastern San Diego communities;
- Enhanced transit network with increased transportation options and improved connectivity;
- New employment opportunities in the transportation market available to local residents and the potential for local economic growth as a result of the accrued economic benefits generated from an enhanced transit network, as well as construction and operation of a new bus maintenance facility;
- Introduction of clean ZEB technology, which would result in improved localized air quality conditions, and removal of other industrial uses;
- Improved public health and safety and an overall improvement in air quality for the San Diego region; and
- Enhanced neighborhood conditions through construction of a modern LEED certified facility including improved stormwater management.

These long-term benefits would balance and outweigh the short-term construction impacts experienced by minority and low-income populations in the project vicinity.

Further, potential impacts do not rise to the level of "adverse effects" as defined in FTA Circular 4703.1, as discussed in Table 8. Since there are no adverse impacts, then minority populations and/or low-income households would not experience impacts that are appreciably more severe or greater magnitude than those experienced by the non-minority population and/or non-low-income households.

Table 9
FTA CIRCULAR 4703.1 ADVERSE EFFECTS ANALYSIS

FTA Circular 4703.1 Potential Adverse Effect	Project Analysis
Bodily impairment, infirmity, illness, or death	Safety protocols would be implemented during construction and long-term operations of the proposed facility in accordance with federal, state, and local regulations. Thus, there are no foreseeable adverse effects resulting from the project.
Air, noise, and water pollution and soil contamination	Temporary noise increases and air pollutant emissions (dust generation and diesel emissions) would occur during construction. Demolition and construction may also uncover hazardous materials (asbestos, lead-based paint, and potentially contaminated soil and/or groundwater). These impacts would be minimized to the extent practicable and/or avoided through implementation of avoidance and minimization measures and would not result in substantial adverse environmental effects. The proposed facility would consist of a 100 percent ZEB bus fleet, which is expected to reduce air and noise pollution locally and regionally. Also, the potential for water pollution would be reduced compared to existing conditions because the proposed facility would be constructed to meet current stormwater best management practices. Thus, there are no foreseeable long-term or cumulative adverse effects resulting from the project.
Destruction or disruption of man-made or natural resources	No man-made or natural resources are present at the project site. Project development would occur entirely within the existing footprint of current industrial uses. The project would not destroy or disrupt any identified protected resources. Thus, there are no foreseeable adverse effects resulting from the project.
Destruction or diminution of aesthetic values	The project site is located on existing developed property with industrial uses. No protected visual resources occur on the site. The project would replace existing industrial uses with a similar industrial use

	that would not substantially change the visual character or quality of the project area. During construction, lighting would be used if nighttime construction activities occur (although not anticipated), but this would occur on a temporary basis and would be directed onto the construction area and shielded to prevent spillover into the adjacent open space canyon. External lighting would be used at the proposed facility during nighttime hours. The proposed lighting would be similar to the existing project area lighting and would not introduce new and unique sources of light that would be substantial in relation to the existing lighting characteristics of the project area. Screening and other features would be incorporated into the project design to avoid or minimize spillover into the adjacent open space canyon. Thus, there are no foreseeable adverse effects resulting from the project.
Destruction or disruption of community cohesion or a community's economic vitality	The project would occur on a developed site in a developed area that is already served by existing infrastructure. No new major supporting infrastructure facilities would need to be constructed and/or extended to the project site that could result in a physical disruption of the community. The project also would not disrupt community activities or community uses. Access and use of such facilities in the project area would not be impeded or disrupted by construction or operation of the project. The project site is developed with industrial uses that do not include major community-serving retail or commercial uses. To the extent individual tenants or businesses would be required to relocate, all acquisition and relocation activities would comply with state and federal laws related to acquisition and relocation benefits. Thus, there are no foreseeable adverse effects resulting from the project.
Destruction or disruption of the availability of public and private facilities and services	Brief interruptions in utility service may occur during the construction period as connections or relocations are required. The project is already developed with industrial uses and do not include major public or private facilities and services. To the extent individual tenants or businesses would be required to relocate, all acquisition and relocation activities would comply with state and federal laws related to acquisition and

	relocation benefits. Thus, there are no foreseeable adverse effects resulting from the project.
Vibration	Temporary impacts from vibration may occur during the construction period but are not anticipated to result in adverse effects. Vibration is not a foreseeable long-term impact resulting from the project as there would be no uses or operations that would generate substantial vibration (refer to Item K).
Adverse employment effects	Adverse employment effects from relocating existing tenants or businesses are not expected because all acquisition and relocation activities would comply with state and federal laws related to acquisition and relocation benefits. In addition, construction of the project would generate additional jobs. At full operation, the project is expected to include up to 600 jobs, many of which will be available to community residents. MTS intends to develop a local hiring and recruitment plan in advance of the facility opening to recruit local residents for jobs at proposed and other MTS facilities.
Displacement of persons, businesses, farms, or non-profit organizations	No residential uses or farms would be displaced. To the extent individual tenants or businesses would be required to relocate, all acquisition and relocation activities would comply with state and federal laws related to acquisition and relocation benefits. The goal would be to identify relocation sites within the businesses' preferred communities. MTS would work directly with each business to develop a relocation plan. Thus, there are no foreseeable adverse effects resulting from the project.
Increased traffic congestion, isolation, exclusion, or separation of individuals within a given community or from the broader community	Isolation, exclusion, or separation of individuals within a given community or from a broader community is not a foreseeable impact resulting from the project. The project would replace existing industrial uses with a different industrial use. Temporary traffic congestion and detours on local roads, including pedestrian, bicycle, and transit may occur during construction. However, a traffic management plan would be implemented during construction to avoid or minimize delays and congestion. Traffic modeling did not identify a long-term increase in traffic congestion on nearby roadways and intersections as a result of the project (refer to Item F).
The denial of, reduction in, or significant delay in the receipt of benefits of DOT programs, policies, or activities	The proposed project would facilitate the delivery of more transit program benefits by providing MTS with the capacity to increase transit service frequencies and routes and converting to a full zero-emission bus fleet by or before the State of California's 2040 goal.

	Thus, there are no foreseeable adverse effects resulting from the project.

As discussed above, potential adverse effects would be minimized or avoided and/or would be balanced and outweighed by long-term benefits. The proposed project would make it possible for MTS to bring additional public transit services to the surrounding community, including prioritizing the surrounding communities' bus routes for conversion to ZEB fleet assignments. Therefore, the project would not cause disproportionately high and adverse effects on minority or low-income EJ populations compared to non-minority and non-low-income populations.

O. SECTION 4(F) USE

Section 4(f) of the Department of Transportation Act of 1966, codified in federal law at 49 USC 303, declares that "it is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites."

The project site is located in a developed area within the Ridgeview neighborhood of the Mid-City: City Heights community of central San Diego. Within the project area, 4(f) protected resources include Sunshine Berardini Field, Chollas Parkway Open Space, and the City's MHPA, as described below:

- Sunshine Berardini Field: This City neighborhood park encompasses approximately 40 acres and is located immediately adjacent to the project site to the north, west and east of Fairmount Avenue. This park contains athletic fields, a comfort station, concession stand, and open space (refer to Figure 5).

- Chollas Parkway Open Space: This open space area is located approximately 1,000 feet to the north and northeast of the project site and consists of an open space system along Chollas Creek (refer to Figure 5).

- MHPA: The MHPA is the City's biological preserve, as identified in the City of San Diego's Multiple Species Conservation Program Subarea Plan. The MHPA occurs as close as approximately 150 feet to the north within the open space area to the north (refer to Figure 5).

The project would not result in a temporary, permanent, or constructive the use of any of these 4(f) resources. Project construction and operations would occur entirely within the existing developed footprint of the site and would not encroach into the adjacent Sunshine Berardini Field or nearby MHPA. Furthermore, the project would not substantially diminish any of the park's or MHPA's activities, features, or attributes that afford these resources protection under Section 4(f) and thus, would not cause a constructive use due to proximity impacts. Additionally, the project would not result in any use of Chollas Parkway Open Space given the distance from the project site and intervening development.

As discussed in Item I, *Historical and Cultural Resources*, there are no historic sites or historic structures within the project site, but there are 19 recorded cultural sites within half-mile of the project site. However, the project would not directly or indirectly impact these cultural sites.

Therefore, the project would not result in temporary occupancy, permanent use, or constructive use of protected 4(f) resources.

P. SECTION 6(f)

No parks or recreational facilities in the project area that would be subject to Section 6(f) of the Land and Water Conservation Fund Act would be converted to non-recreational use by the project.

Q. SEISMIC AND SOILS

A geotechnical desktop study was prepared for the project (Allied Geotechnical Engineers 2022b) to evaluate potential seismic and non-seismic-related hazards associated with project implementation. This report is contained in Appendix H and is summarized below.

There are no unusual seismic or soil conditions on the project site or in the vicinity. The project site is located within the seismically active San Diego region. There are no known active faults mapped near the project site. The closest major active fault to the project site is the southern extension of the Rose Canyon fault zone in downtown San Diego, approximately 3.3 miles west of the project site. The project site is however located within the potentially active La Nacion fault zone. The main fault trace is mapped approximately one mile to the east of the project site. A northwest trending strand of the La Nacion fault is mapped on the side walls of Chollas Creek approximately 1,500 feet northwest of the project site. The general trend of this fault strand extends toward the project site. Given that this fault is classified as potentially active[6], there is a low potential for ground rupture resulting from on-site faulting. Although the La Nacion fault zone is not considered to pose a significant risk in terms of seismic activity, the possible presence of a fault splay across the project site poses a potential for secondary movement along the fault as a result of a major earthquake on one of the regional active faults. The Geotechnical Study includes a recommendation that the subsurface geotechnical investigation to be conducted for the final design of the proposed project should include the performance of fault trenching studies to verify the presence, location, and nature (type and age of movement) of the suspected fault at the project site. Although the fault may be considered potentially active (as opposed to active), the Geotechnical Study also recommends not placing a structure directly astride the fault, and appropriate recommendations for a structural setback from the fault should be developed based on the results of the fault trenching studies. In addition, the project would be required to be constructed in accordance with the applicable California Building Code (CBC) guidelines to avoid adverse effects related to fault rupture. Seismic hazards would be avoided through adherence to the recommendations in the Geotechnical Study and industry standard geotechnical practices and seismic structural design in accordance with the CBC.

The project site is underlain by hard formational materials, which are not considered to be liquefiable. Furthermore, the project site is not located in an area with shallow groundwater, and the project site is not mapped in a “Potential Liquefaction Area” as identified by the City of San Diego Seismic Study Geologic Hazards and Faults Map (City of San Diego 2008b). Therefore, the potential for seismic-induced liquefaction at the project site is considered negligible.

The proposed project would not result in long-term, operational impacts associated with soil as the site is almost entirely covered by impervious surfaces and this would be the case upon construction of the project. In addition, the project’s net increase in off-site runoff volumes compared to existing conditions would be minimal at less than one cubic foot per second (Nasland Engineering 2022a) such that no substantial soil erosion would occur at downstream receiving waters upon project implementation.

[6] Potentially active means that there is documented evidence of movement within Pleistocene time (the last 1.5 to 2 million years) but no movement in Holocene time (the last 11,000 years).

During construction, substantial soil erosion would be avoided through conformance with a National Pollutant Discharge Elimination System (NPDES) Construction General Permit. This permit would include preparation of a Storm Water Pollution Prevention Plan (SWPPP), which would incorporate BMPs to prevent soil erosion and the loss of topsoil. Implementation of BMPs identified in the SWPPP and erosion controls incorporated into the project design would ensure that the project would not result in substantial soil erosion.

The project site is entirely developed and most of the near surface soils have likely been reworked to some degree to accommodate the existing development. Generally, site soils are prepared or compacted during development in accordance with building code requirements. Standard geotechnical practices and implementation of building code requirements would reduce potential geological risks.

R. IMPACTS ON WETLANDS

EO 11990 of May 24, 1977, *Protection of Wetlands*, requires that an analysis of impacts on wetlands be performed for any mass transportation project that may affect a wetlands area. In addition, per Section 404 of the Clean Water Act, infrastructure development projects must document minimal impacts on wetlands resulting from dredged or fill material. The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory wetland mapper was consulted to assess the impact of the project on any wetlands that may occur on or near the project site (USFWS 2023a). The project site is located in an urbanized area and is entirely developed and does not contain wetlands or other waters of the United States. The site borders an open space area to the north that consists of a vegetated slope that transitions to a canyon that is traversed by Chollas Creek, which is identified as Riverine on the USFWS wetland mapper. Project improvements and construction activities would not encroach into this adjacent open space area and would not directly impact Chollas Creek or result in indirect impacts associated with hydrologic interruption. Standard construction BMPs would be implemented during project construction, such as installation of orange fencing and sedimentation control measures to further avoid indirect impacts to Chollas Creek and associated downstream waters. Therefore, the project would have no impacts on wetlands.

S. FLOODPLAIN IMPACTS

According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center (FEMA 2023), the project site is not mapped within a flood hazard area or special flood hazard area (Panel 06073C1901G). However, the northern portion of the project site borders a slope that descends towards Chollas Creek, which occurs within a mapped 100-year floodplain. This area is within the channel of the stream and adjacent floodplains, approximately 100 feet north of the project site. However, the project site is higher in elevation and is not located within the 100-year floodplain that is subject to inundation by a one-percent-annual-chance flood event. While the proposed project would result in a minor increase in impermeable surfaces, construction and operations would not impede or redirect flood flows within the nearby floodplain. No impacts to floodplains would occur.

T. IMPACTS ON WATER QUALITY, NAVIGABLE WATERWAYS, AND COASTAL ZONES

A Preliminary Drainage Study (Nasland Engineering 2022a) and Preliminary Post Construction Stormwater Management Plan (PCSMP; Nasland Engineering 2022b) were prepared for the proposed project. These reports are contained in Appendices I and J and are summarized below.

The project site is located in an urbanized area in the central portion of the City of San Diego and outside of the Coastal Zone. There are no surface water features, navigable waterways, or designated sole-source aquifers on the site. The closest surface water body to the project site is Chollas Creek located approximately 300 feet to the north in the adjacent open space canyon. Chollas Creek is also the closest impaired water body identified on the Clean Water Act 303d Listed Impaired Water Bodies; it is listed for pollutants including copper, diazinon, indicator bacteria, lead, and zinc (RWQCB 2020). Implementation of the BMPs in the PCSMP would ensure that the proposed project would not create adverse water quality impacts to Chollas Creek.

There are no groundwater resources in the project area. The groundwater table is estimated to be at depths of greater than 100 feet below the ground surface (Allied Geotechnical Engineers 2022b). Although the proposed project would require some grading, it would not be at depths deep enough to encounter or interfere with groundwater. Moreover, the project would not directly involve groundwater use. As a result, the project would not substantially decrease groundwater supplies.

The proposed project would not substantially alter the overall existing drainage patterns. Upon development, runoff from the site would continue to be directed across the site in generally the same direction. Project development would result in a net increase in impervious area of approximately four percent, but this would result in a minimal increase in peak runoff volumes (approximately one cfs). This change is considered a negligible increase and would not adversely affect the project area or downstream areas associated with substantial erosion or siltation. Runoff from the project site would be collected by the on-site storm drain system and biofiltration basins, treated in accordance with the water quality regulations, and then discharged into the existing storm drain system along Federal Boulevard or the existing storm drain outfall that ultimately discharges into Chollas Creek and the San Diego Bay. Additionally, during construction, the project would adhere to the requirements of the Construction General Permit which would require the implementation of BMPs that would serve to protect water quality (refer to Item Q). No adverse impacts to water quality would occur.

U. IMPACTS ON ECOLOGICALLY SENSITIVE AREAS AND ENDANGERED SPECIES

The project site is completely developed and paved with the exception of a few ornamental trees primarily along the Federal Boulevard and 47th Street frontages. These ornamental trees are scattered and would not be expected to support special status species. No sensitive habitat occurs within the project site that could support special status species. The site is adjacent to open space on the north that contains sensitive habitat and functions as a local wildlife corridor, but no disturbances or improvements would occur within the adjacent open space area. The USFWS' Information for Planning and Consultant (IPaC) System (USFWS 2023b) was reviewed to identify listed species and critical habitat known or expected to be on or near the project area. Although the list identified 18 species (1 mammal, 6 birds, 2 insects, 2 crustaceans, and 7 plants), none occur on the project site due to the developed nature of the site. Additionally, the project site is not located within or adjacent to designated critical habitat or essential fish habitat. As such, the project would not require permits or consultation from the U.S. Army Corps of Engineers, USFWS, or National Marine Fisheries Service.

Due to the presence of adjacent sensitive habitat within the open space area that also functions as a local wildlife corridor, there is potential for indirect effects to special status species should they be present in the adjacent off-site area. Portions of the open space area are part of the City of San Diego's MHPA and occur as close as approximately 150 feet downslope from the northern site boundary (refer to Figure 2). The MHPA is the City's biological preserve, as identified in the City of San Diego's Multiple

Species Conservation Program Subarea Plan. The City's MSCP Subarea Plan (City of San Diego 1997) addresses (among other things) impacts to preserve areas from adjacent development in Section 1.4.3, Land Use Adjacency Guidelines. The Land Use Adjacency Guidelines provide requirements for land uses adjacent to the habitat preserve in order to minimize indirect impacts from drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading to the sensitive resources contained therein. The project site is not located directly adjacent to the MHPA but is in close proximity to the MHPA (as close as approximately 150 feet) and thus is subject to compliance with the Land Use Adjacency Guidelines. The project's consistency with the Land Use Adjacency Guidelines is summarized below in Table 9, which concludes that the project would not result in adverse indirect effects on special status species. Based on the above analysis, the project would not result in adverse impacts to ecologically sensitive areas or endangered species.

Table 10
MHPA LAND USE ADJACENCY GUIDELINES CONSISTENCY ANALYSIS

MHPA Land Use Adjacency Guideline	Project Consistency
Drainage	
All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA.	The proposed project would occur within the existing developed areas. Runoff from the proposed parking lots and developed areas on most of the site would be directed to existing gutter along Federal Boulevard. Runoff in the northwest portion of the site would be directed to a storm drain pipe that outfalls off site onto the slope and canyon within the open space area to the north after being treated on site. While the outfall occurs within the open space area, it is not within the MHPA. Thus, site runoff would not drain directly into the MHPA.
All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.	BMPs would be implemented during project construction to control runoff, erosion, and contaminants, as necessary, in order to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might be contained within stormwater. The BMP program will meet applicable requirements of the State Water Resources Control Board and the City of San Diego's Municipal Code and Storm Water Standards Manual. Exotic plant materials are further restricted from the project's landscaping, thereby preventing the introduction of a new sources of exotics at the project site. Furthermore, site runoff that would be directed to the open space area to the north in close proximity to the MHPA would be treated on site before being discharged off site.
Toxins	
Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, which are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by	The proposed project would include the storage and use of chemicals associated with automotive maintenance (e.g., solvents, cleaners, oils, lubricants, and paint. MTS is required to comply with applicable federal, state, and local regulations related to the use,

the application and/or drainage of such materials into the MHPA.	transport, storage, and disposal of chemicals. BMPs would be implemented during project construction to prevent the release of toxins and chemicals. Site runoff that would be directed to the open space area to the north in close proximity to the MHPA would be treated on site before being discharged off site.
Lighting	
Lighting of all developed adjacent areas should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	Project lighting would be shielded and directed away from the open space area to the north and MHPA beyond to protect resources in the MHPA from artificial night lighting.
Noise	
Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife use of the MHPA.	Project construction activities, particularly demolition and grading, conducted during the avian breeding season (generally February through September) could potentially result in indirect noise effects to listed species should they be present in the MHPA. During construction, temporary noise control barriers would be installed at the northern edge of the project site to reduce construction noise levels within the MHPA. Additionally, stationary equipment at the proposed facility could also generate noise during regular operations that could potentially result in indirect effects to listed species within the nearby MHPA. MTS would prepare and implement a project operational noise control plan to reduce operational noise levels within the MHPA. Noise reduction measures would be incorporated into the design of the proposed facility and may include sound barriers around the project site or around individual pieces of equipment.
Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species.	As discussed above, project construction and operations could potentially generate noise at the nearby MHPA that could indirectly affect wildlife. The project would include appropriate noise controls during construction and features that would be incorporated into the project design.
Barriers	
New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	Perimeter fencing would be installed at the northern site boundary to prevent unauthorized access into the nearby MHPA from the project site.
Invasive Plant Species	
No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	BMPs during construction would include measures to avoid introduction of invasive plants into construction areas by equipment. Proposed landscaping associated with the project would not include plant species

	identified as invasive by the California Invasive Plant Council.
Brush Management	
New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA.	The project brush management zones would not extend beyond the project's permanent footprint or encroach into the MHPA. The proposed buildings would be set back from the adjacent canyon and MHPA to meet applicable brush management requirements.
Grading/Land Development	
Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.	All manufactured slopes are located within the development footprint and would not occur within the MHPA.

V. IMPACTS ON SAFETY AND SECURITY

The project is consistent with the on-site and surrounding land use and zoning designations, and implementation of the project would not introduce incompatible uses to the project area that would create safety concerns. Access points to the proposed facility would be designed in accordance with applicable design standards to avoid safety hazards. Additionally, during construction, the proposed project would comply with local regulations regarding temporary road closures and/or traffic controls. The project would not impact existing transit (e.g., bus stops), bike lanes, and pedestrian (e.g., sidewalks) facilities in the project area. The proposed project would include modifications along Federal Boulevard, including installation of a traffic signal at the site's western-most access driveway and a signal modification at the Federal Boulevard/47th Street intersection (to include an eastbound right-turn overlap phase). These proposed modifications, along with project-generated traffic, would not result in safety hazards to pedestrians, bicyclists, or motorists. Additionally, proposed on-site facilities would be designed in accordance with required Americans with Disabilities Act (ADA) standards. Project lighting would also be provided within the site to provide security during nighttime operations. No adverse impacts related to safety and security would occur.

W. IMPACTS CAUSED BY CONSTRUCTION

Construction would primarily consist of demolition/site clearing, grading, building construction, and paving. Construction is anticipated to last approximately 18 months and would predominantly take place during daylight hours and would take into account peak travel hours so as to minimize delays wherever possible. Although not anticipated, some nighttime work may be necessary where specific work activities would disrupt traffic or potentially create safety concerns. A MHPA Construction Noise Control Plan and a Stationary Equipment Noise Control Plan will be prepared and implemented and will address activities such as potential nighttime work. Staging would occur entirely within the project site and would not require use of off-site properties or roadway right-of-way.

Traffic delays could occur during construction but would be temporary in nature. Detours with alternative routing and appropriate signage would be provided to maintain access for motorists, transit

riders, and pedestrians. Some closures to streets and intersections as well as removal of on-street parking could occur; however, these closures would be limited in duration. Detailed traffic plans would be developed during final design to ensure safety during construction and emergency vehicle access is not impeded.

General construction noise impacts to people passing by, living, or working near the project can be expected. However, considering the relatively short-term nature of construction noise at any one location and predominantly daytime scheduling of construction activities, these impacts are not expected to be substantial.

Short-term emissions of criteria pollutants would be generated during the construction period but as discussed in Item H, *Air Quality*, emissions would not be substantial. People within the project vicinity could potentially detect odors associated construction equipment, but such odors would be temporary, intermittent, and localized to the immediate area.

No impacts would occur to water resources during construction. BMPs would be implemented during construction to offset potential surface runoff or soil erosion that could affect water quality of downstream receiving waters.

Prior to construction, procedures for identifying, characterizing, managing, handling, storing, and disposing of contaminated soil and ACM or lead-based paint encountered during construction activities would be developed by the construction contractor as part of the project construction plan. Contaminated material encountered during construction would be disposed of at a facility permitted to accept such material.

No relocation of major utilities would be needed. The project would connect to existing utility facilities in the area, which may require very short utility disruptions while the connections are being made; however, this period is anticipated to be minimal.

Archaeological monitoring would be conducted during project construction given the archaeological sensitivity of the project area. Should any archeological resources or human remains be discovered during construction-phase ground-disturbing activities, all construction activities in the immediate vicinity of the find must stop until the find can be assessed by a qualified archaeologist and tribal monitor/consultant.

X. SUPPORTING TECHNICAL STUDIES OR MEMORANDA

Technical studies and analyses prepared for the project are listed below. The technical studies are summarized in the respective sections of this document and are also included as appendices to this CE Worksheet.

- Clean Transit Advancement Campus Transportation Impact Study (July 2022)
- San Diego Metropolitan Transit System Clean Transit Advancement Campus Project Air Quality Technical Report (August 2022)
- MTS Clean Transit Advancement Campus Project Cultural Resources Survey Report (July 2022)
- MTS Clean Transit Advancement Campus Project Noise Impact Report (July 2022)

- Phase I Environmental Site Assessment Study, San Diego MTS Clean Transit Advancement Campus Project (May 2022)
- Geotechnical Desktop Study, San Diego MTS Clean Transit Advancement Campus Project (May 2022)
- Preliminary Drainage Study for MTS Clean Transit Advancement Campus (May 2022)
- Preliminary Post Construction Stormwater Management Plan, MTS Clean Transit Advancement Campus (October 2022)
- Clean Transit Advancement Campus Final Initial Study/Mitigated Negative Declaration (October 2022)

Y. PUBLIC OUTREACH AND AGENCY COORDINATION

Extensive public outreach was conducted as part of the site selection and planning process to engage and seek input from the surrounding community regarding the proposed project. In order to assist with public engagement efforts for planning and site selection activities, MTS and SANDAG partnered with Urban Collaborative, a community-based organization active within the project area. Representatives from Urban Collaborative helped interface and communicate with the community, generally, and helped plan, schedule, and coordinate two public meetings in September 2021. Urban Collaborative representatives have also conducted in-person noticing and outreach to the communities of City Heights and Southeastern San Diego. Community events at which the project was discussed have included the following:

- August 3, 2021, International Night Out, Gompers Park
- August 4, 2021, Community Health and Resource Fair, Jackie Robinson YMCA

Two additional meetings were conducted at the Valencia Park/Malcolm X Library at 5148 Market Street and via Zoom on September 13 and 27, 2021, from 5:00 to 7:00 PM. These meetings were conducted in a hybrid in-person and virtual format, including a PowerPoint presentation of the project overview, followed by a question-and-answer community discussion session. The presentation was made twice at each meeting, at 5:00 and 6:00 PM the opportunity to view the full presentation and ask questions. Bilingual staff and interpreters (English and Spanish) were present for virtual and in-person translation; other languages were available if requested.

Comments were received about concerns the project may encounter hazardous waste and burn ash. MTS/SANDAG provided a response stating that, although there is no evidence that burn ash occurs on the project site, mitigation, such as sampling and testing soil for hazardous materials, has been identified. Other comments were received related to potential effects to wildlife in Chollas Creek. MTS/SANDAG clarified that the project site is completely developed, and that no sensitive habitat occurs within the project limits. A Construction Noise Control Plan and Stationary Equipment Noise Control Plan would be prepared and followed to mitigate potential indirect impacts to sensitive species outside of the project area. The proposed buildings would not be high enough to impede migratory bird flight patterns, and there is no expectation that proposed buildings would increase nesting/perching of predatory bird species. Concerns were also made about the potential for the project to adversely affect

traffic conditions, to which SANDAG/MTS responded that the TIS found that the traffic levels associated with the project can be accommodated without exceeding the capacity of the roadway system.

An additional virtual meeting was conducted via Zoom on June 16, 2022 that included a PowerPoint presentation of the project and updates since the two initial public meetings. The presentation was made twice: at 12:00 PM and at 5:00 PM. The presentation is available on the project website (https://www.sdmts.com/inside-mts-current-projects/division-6).

The fourth public meeting was held in-person at the Euclid Avenue Transit Center on July 7, 2022. This meeting consisted of an open style format with various stations that addressed specific topics, such as project overview, potential sites, and environmental review. MTS and SANDAG staff staffed the stations and were available to answer questions and provide information to the public.

MTS provided notice to the community about the meetings to encourage people to participate. Noticing was done using methods that maximize exposure to low-income and minority populations. These included direct mail to 2,500 households in site selection areas, advertisements in local diverse community publications (Filipino Press, Voice and ViewPoint, La Prensa). MTS also noticed meetings in its Rider Insider e-newsletter with approximately 13,000 subscribers and on its dedicated CTAC webpage.

Additionally, MTS has engaged with community planning groups, town councils, and other stakeholders on the following dates:

- 9/1/21: Urban Collaborative Transportation Outreach Group (Zoom)
- 9/13/21: MTS/SANDAG Division 6 Public Outreach, Session One (Hybrid; Malcolm X Library + Zoom)
- 9/16/21: Eastern Area Communities Planning Committee (Zoom)
- 9/16/21: Webster Community Council (Zoom)
- 9/27/21: MTS/SANDAG Division 6 Public Outreach, Session One (Hybrid; Malcolm X Library + Zoom)
- 9/30/21: MTS Community Advisory Committee (Zoom)
- 11/1/21: City Heights Community Planning Group (Zoom)
- 5/4/22: Joint Town Council (Zoom)
- 5/16/22: Chollas Valley Community Planning Group
- 5/19/22: Webster Community Council
- 6/16/22: MTS/SANDAG CTAC Public Outreach (Zoom, 12pm & 5pm)
- 7/7/22: MTS/SANDAG CTAC Public Outreach (Euclid T.C., 5-7pm)

MTS staff have also conducted outreach to several legislative/elected officials via one-on-one meetings, group meetings, and notices.

The CTAC Project has a dedicated webpage (https://www.sdmts.com/inside-mts-current-projects/division-6) that serves as the information hub for the project.

Coordination with public agencies have included the NAHC with regard to cultural resources and the City of San Diego regarding transportation. Additionally, consultation with Native American Tribes and the State Historic Preservation Officer was conducted as part of the NHPA Section 106 process.

Z. MODAL CATEGORICAL EXCLUSIONS AND RELATED NEPA DOCUMENTS

Although FTA CEs are listed in 23 CFR 771.118, the most applicable codified CE for the project is listed in FHWA CEs identified in 23 CFR 771.117. Pursuant to 23 CFR 771.118(e), provisions allow for cross-agency use of codified CEs:

> Any action qualifying as a CE under §771.116 or §771.117 may be approved by FTA when the applicable requirements of those sections have been met. FTA may consult with FHWA or FRA to ensure the CE is applicable to the proposed action.

The action described above meets the criteria for a NEPA CE in accordance with 23 CFR 771.117(d)(8): construction of new bus storage and maintenance facilities:

> "Construction of new bus storage and maintenance facilities in areas used predominantly for industrial or transportation purposes where such construction is not inconsistent with existing zoning and located on or near a street with adequate capacity to handle anticipated bus and support vehicle traffic."

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