CLEAN TRANSIT ADVANCEMENT CAMPUS

Draft Initial Study/Mitigated Negative Declaration

Prepared for:

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

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

Prepared by:
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July 2022

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DRAFT MITIGATED NEGATIVE DECLARATION

Project Title:	Clean Transit Advancement Campus (CTAC)
Project Location:	North of Federal Boulevard and west of 47th Street in Ridgeview neighborhood of the Mid-City: City Heights community in the central portion of the City of San Diego
Assessor Parcel Numbers:	541-611-04-00, 541-611-27-00, 541-611-31-00, 541-611-34-00, and 541-611-35-00
Lead Agency:	San Diego Metropolitan Transit System (MTS) 1255 Imperial Avenue, Suite 900 San Diego, CA 92101
Responsible Agency:	San Diego Association of Governments (SANDAG) 401 B Street, Suite 800 San Diego, CA 92101
Project Proponent:	The project is a joint effort between MTS and SANDAG

The Lead Agency, having reviewed the Initial Study of this proposed project, having reviewed the written comments received prior to the public meeting of the Lead Agency, and having reviewed the recommendation of the Lead Agency's Staff, does hereby find and declare that the proposed project will not have a significant effect on the environment. Brief statements explaining the reasons supporting the Lead Agency's findings are as follows: The project site is located within a developed area with industrial and commercial uses and is designated and zoned for industrial uses. The project proposes to construct a bus maintenance and charging facility, which is consistent with the site's industrial land use and zoning designations. The project area has adequate infrastructure including water, sewer, and electricity to support the proposed type and intensity of development. The project would be consistent with local and state policies aimed at reducing air pollutant and greenhouse gas emissions, as the facility would include an all-electric bus fleet. The Initial Study identifies potentially significant effects to biological resources (indirect noise impacts on special status species), cultural resources (unknown subsurface archaeological resources), hazards and hazardous materials (contaminated soil and/or groundwater and hazardous building materials), noise (construction and operational noise at adjacent habitat and surrounding property lines), and tribal cultural resources (unknown subsurface tribal cultural resources) for the proposed project. The implementation of mitigation measures identified in the Initial Study would ensure potentially significant impacts are reduced to less than significant levels. All other environmental impacts would be less than significant, or no impact would occur. Therefore, the project would not result in significant impacts to the environment.

The Lead Agency hereby finds that the Mitigated Negative Declaration reflects its independent judgment. A copy of the Initial Study is attached.

The location and custodian of the documents and any other material which constitute the record of proceedings are as follows:

MTS
1255 Imperial Avenue, Suite 900
San Diego, CA 92101

On the basis of the Initial Study, it has been determined that the proposed project would not result in a significant effect on the environment with implementation of mitigation measures identified in the Initial Study and agreed upon by the project proponents.

Denis Desmond, Director of Planning, MTS

July 14, 2022
Date

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
Act	Alquist-Priolo Earthquake Fault Zoning Act
ADT	average daily traffic
ALUCP	Airport Land Use Compatibility Plan
APE	area of potential effect
APN	Accessor's Parcel Number
Attainment Plan	2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County
BMPs	best management practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
cfs	cubic feet/foot per second
CH_4	methane
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRHR	California Register of Historic Resources
CTAC	Clean Transit Advancement Campus
CWA	Clean Water Act
dBA	A-weighted decibel
DOC	California Department of Conservation
DPM	diesel particulate matter
EDR	Environmental Data Resources
EO	Executive Order
ESA	Environmental Site Assessment
ESL	Environmentally Sensitive Lands
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas

ACRONYMS AND ABBREVIATIONS (cont.)

HFCs	hydroflourocarbons
HRA	health risk assessments
HVAC	heating, cooling, and air conditioning
ITE	Institute of Transportation Engineers
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
kWhr	kilowatt hours
L_{EQ}	time-averaged noise level
L_{MAX}	maximum noise level
LOS	level of service
MBTA	Migratory Bird Treaty Act
MHPA	Multi-Habitat Planning Area
MLD	most likely descendant
MMBtu	million British thermal units
MMT	million metric ton
mph	miles per hour
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MTS	San Diego Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
PCE	perchloroethylene
PCF	perflourocarbons
PM_{10}	particulate matter 10 microns or less in diameter
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code

ACRONYMS AND ABBREVIATIONS (cont.)

RAQS	Regional Air Quality Strategy
RECs	recognized environmental conditions
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
Scoping Plan	Climate Change Scoping Plan
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire Department
SDIA	San Diego International Airport
sf	square feet
SF_5	sulfur hexafluoride
SO_X	sulfur oxides
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
TAC	Toxic Air Contaminant
TIS	Transportation Impact Study
USEPA	U.S. Environmental Protection Agency
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOCs	volatile organic compounds
ZEB	zero emission bus

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1.0 Introduction

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 ("proposed project" or "project site").

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 (phase one) and SANDAG would build the new facility (phase two). MTS would be the owner and operator. As the agency with the principal responsibility for carrying out the first phase of the proposed project and the agency that will act first on the proposed project, MTS is the Lead Agency under the California Environmental Quality Act (CEQA) in charge of preparing the environmental document. SANDAG is considered a Responsible Agency under CEQA.

As the Lead Agency for the proposed project under CEQA, MTS has prepared an Initial Study (IS) to determine if the proposed project could have a significant effect on the environment. The IS identifies potentially significant effects to biological resources, cultural resources, hazards and hazardous materials, noise, and tribal cultural resources, but mitigation measures incorporated into the proposed project by MTS would mitigate these effects to less than significant. There is no substantial evidence, in light of the whole record before the agency, that the project with the implementation of mitigation measures would have a significant effect on the environment. Therefore, pursuant to the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) (§15070[b]), MTS has prepared a Mitigated Negative Declaration (MND) for the proposed project. Included in this Draft MND is the IS documenting the reasons supporting the finding of no significant effect on the environment.

The Draft IS/MND is available for a 30-day public review period pursuant to CEQA Guidelines Section 15105. The public review period will begin on July 14, 2022. Written comments regarding the adequacy of the Draft IS/MND must be received by August 15, 2022. Comments must be provided in writing via the CTAC webpage (https://www.sdmts.com/inside-mts/current-projects/clean-transit-advancement-campus-formally-division-6), emailed to CTACProject@sdmts.com, or mailed to:

MTS
ATTN: CTAC Project Comments
1255 Imperial Avenue, Suite 900
San Diego, CA, 92101

MTS shall prepare written responses to comments on environmental issues received during the noticed public review period. Written comments received by MTS will be included in the public record.

Copies of the Draft IS/MND are available at the SANDAG and MTS offices at the addresses provided on the cover of this Draft IS/MND and online at:

https://www.sdmts.com/inside-mts/current-projects/clean-transit-advancement-campus-formally-division-6

A copy of the Draft IS/MND also is available at the following public library:

Malcolm X Library
5841 Market Street
San Diego, CA 92114

2.0 Project Description

This section includes a description of the proposed project, project background, and the environmental setting, as well as anticipated discretionary actions and approvals. The project description is used as the basis for analyzing the proposed project's impacts on the existing physical environment, pursuant to CEQA, throughout this IS/MND.

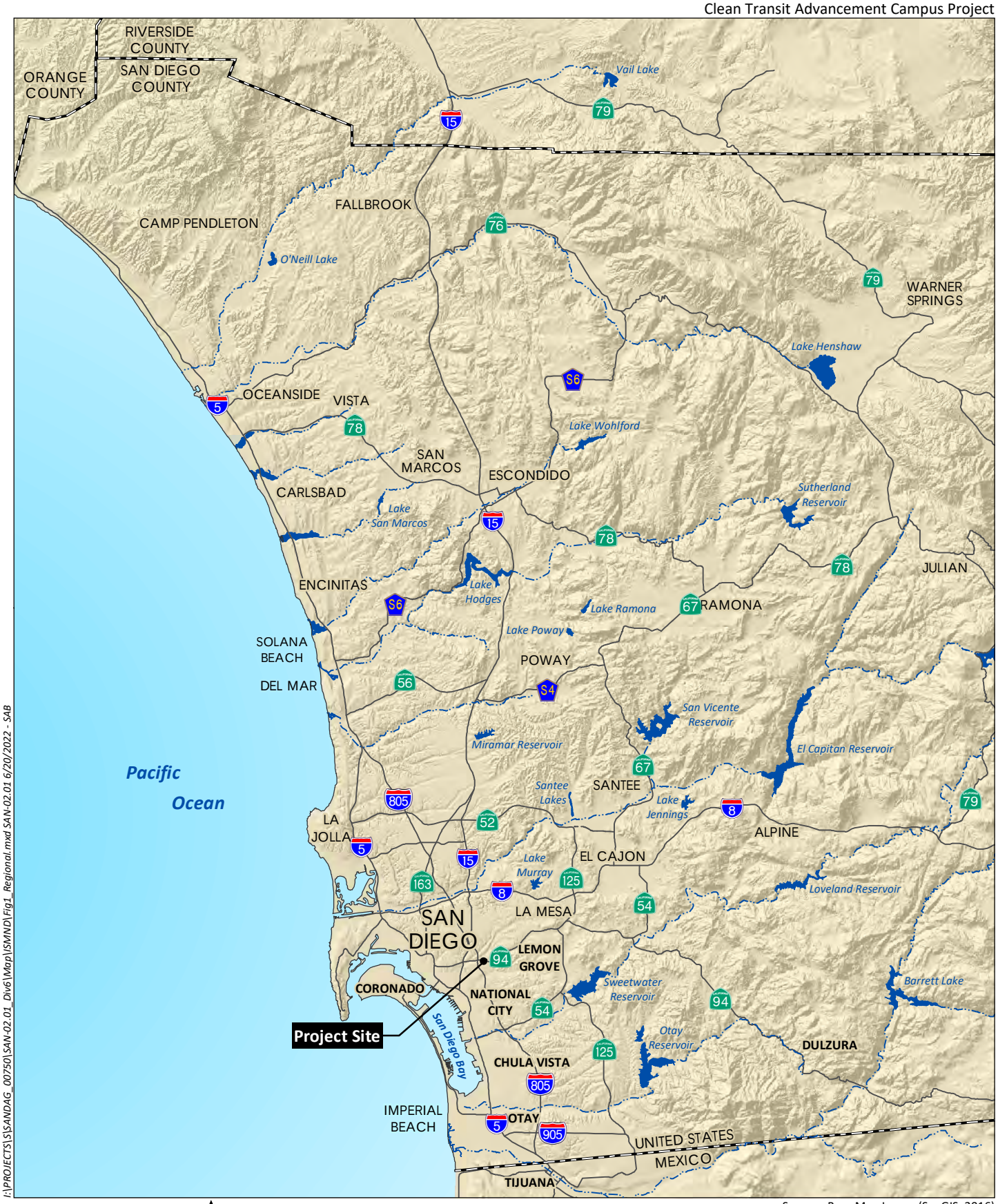
2.1 Project Background

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 800 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 from natural gas to zero-emission buses 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.

2.2 Project Location and Setting

The proposed project is located in the central portion of the City of San Diego in western San Diego County (Figure 1). The project site encompasses approximately 12.1 acres comprised of Accessor'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



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0 8 Miles

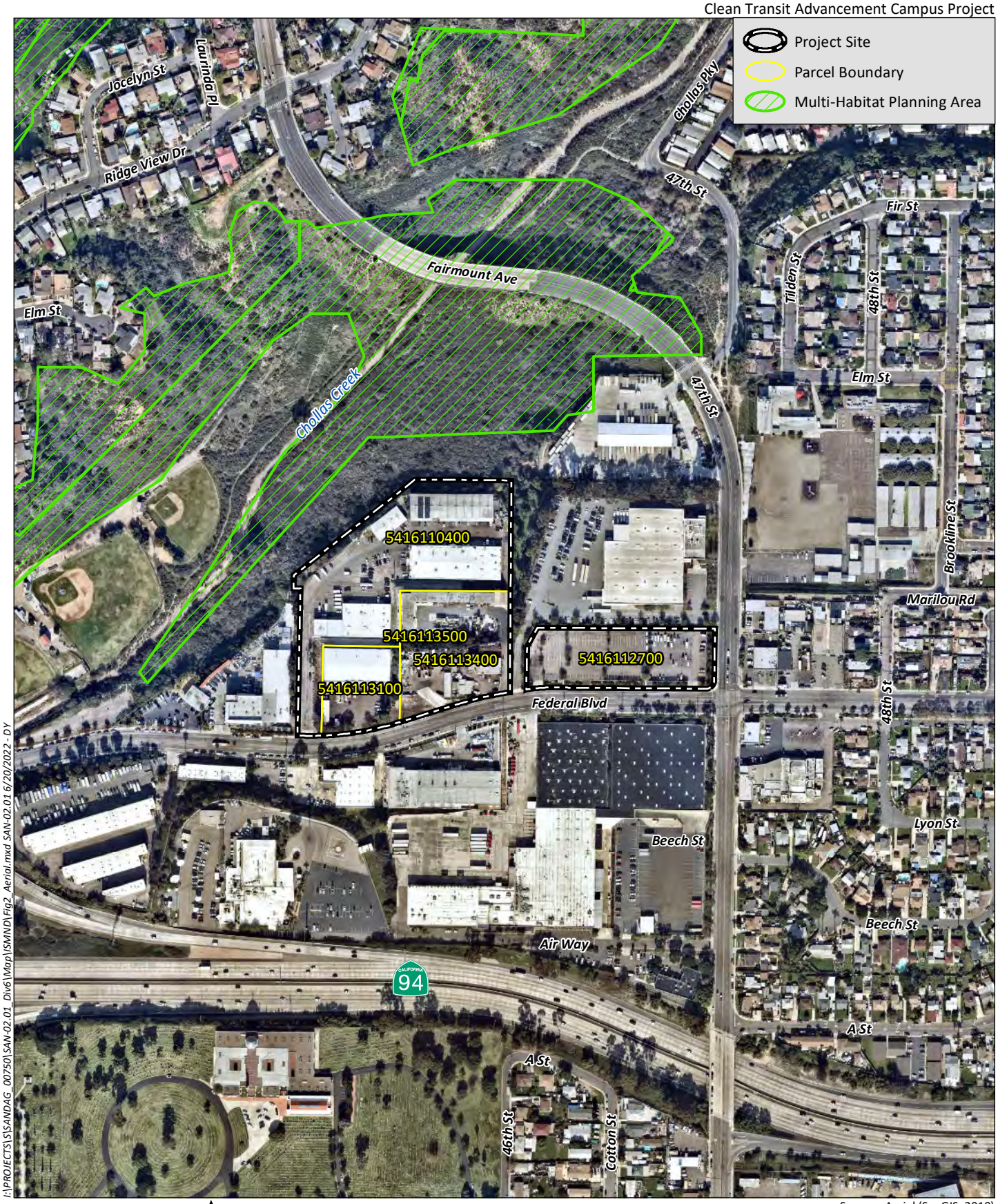
Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1

Clean Transit Advancement Campus Project



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0 400 Feet

Source: Aerial (SanGIS, 2019)

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Project Location

Figure 2

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 (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 Multi-Habitat Planning Area (MHPA) is located as close as approximately 150 feet to the north within the adjacent open space canyon as well. Sunshine Bernardini 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 (amsl) 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.

2.3 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 potentially 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, bus washes, and an administration 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. Figure 3, *Site Plan*, provides a schematic layout of the proposed project components.

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 zero emission bus (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.

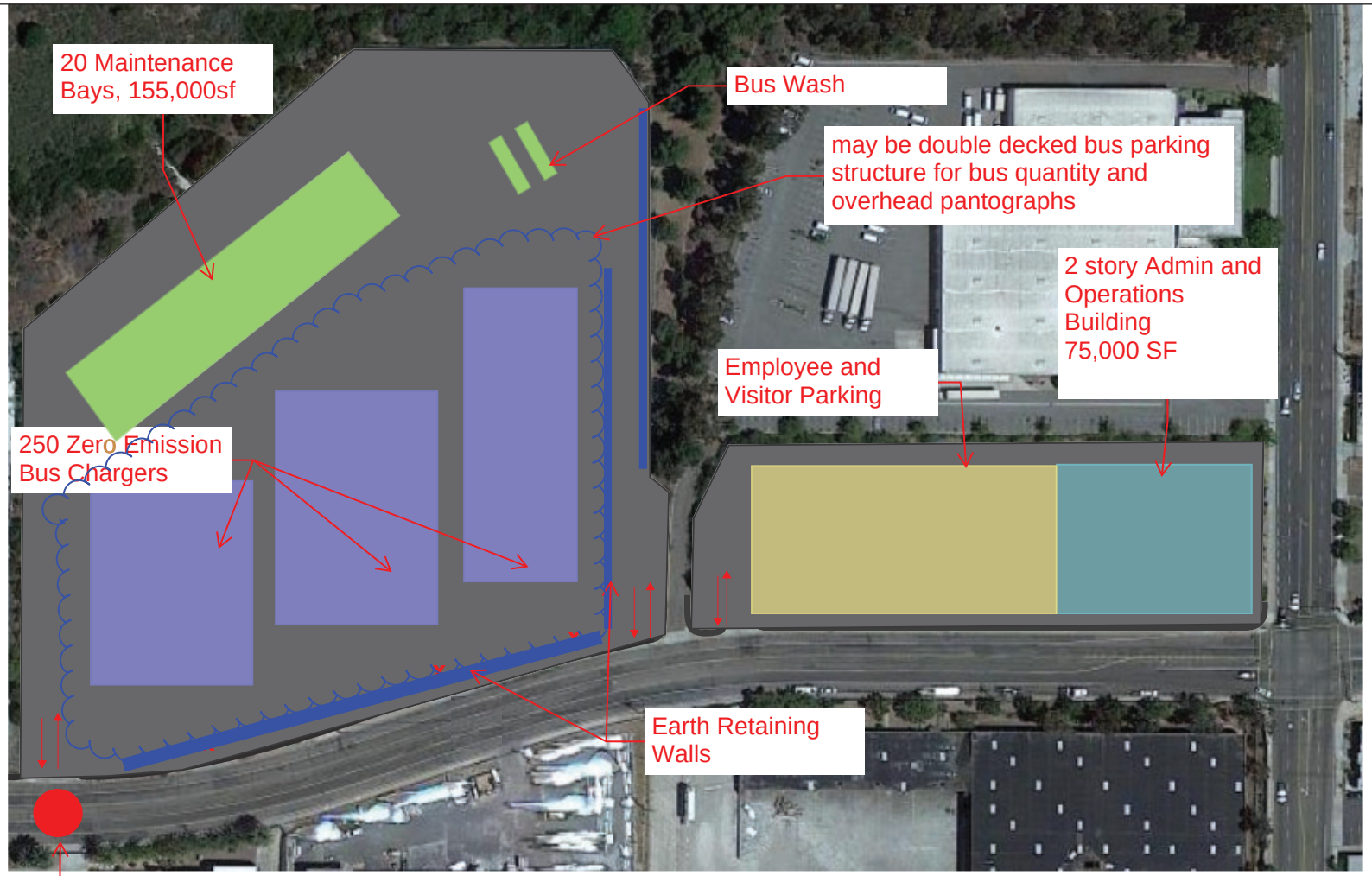
Retaining walls would be constructed in some locations along the bus parking/charging lot. Proposed fencing would consist of a combination of block wall and/or chain link and would vary from approximately 6 to 12 feet above grade depending on whether it was near the frontage or near adjacent properties. 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.

[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. While an economic or social change by itself is not considered a significant effect on the environment under CEQA (State CEQA Guidelines sections 15131 and 15382), 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.



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Site Plan

Figure 3

For purposes of the environmental analysis of the IS/MND, 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. The analysis also assumes that construction activities would occur during daytime hours. Construction staging is anticipated to occur within the project site and construction access would be provided via Federal Boulevard.

2.4 Lead Agency Discretionary Actions

MTS Board discretionary actions related to the proposed project include:

- Adopt the Final IS/MND for the proposed project.
- Initiate and complete real property transactions, including but not limited to purchase and sale agreements for fee title acquisition, relocation benefits agreements with tenants, quiet title actions, and all other actions that may be required for public agency voluntary or involuntary acquisitions under state and federal law.
- Application for and acceptance of state or federal grant funding to complete the proposed project.

2.5 Other Agency Permits and Approvals

2.5.1 SANDAG

Under the agencies' unique statutory framework, as implemented by Senate Bill (SB) 1703 (2002), MTS owns and operates the transit system within its jurisdictional boundaries, and SANDAG is responsible for planning, programming, project development, and construction for specified transit projects, including "regional bus facilities." (Public Utilities Code sections 132353, 132353.1, and 132353.2.) A master memorandum of understanding between MTS and SANDAG, including several addenda, documents how the agencies implemented the SB 1703 consolidation requirements (See MTS Doc. No. G0930.0-04, as amended; SANDAG Agreement No. 5000710, as amended). Under that agreement, MTS requested that SANDAG assist MTS in conducting the environmental review for the proposed project, which ultimately culminated in this Draft IS/MND.

Following and concurrent with MTS' actions to acquire the real property rights necessary for the proposed project, SANDAG will consider the Final IS/MND for the proposed project as a Responsible Agency and take discretionary actions to direct staff to proceed with the planning, programming, project development, and construction steps for the proposed project.

2.5.2 City of San Diego

MTS and SANDAG are exempt from local land use and zoning ordinances and are therefore not required to obtain City of San Diego building permits to construct the proposed project (Public Utilities Code section 120050(c) and 132354.4; Gov. Code sections 53090 and 53091). However, MTS and SANDAG have entered into Project Processing Memorandums of Understanding to guide and coordinate a plan

review and meet and confer process for MTS and SANDAG projects within the City of San Diego's jurisdiction. Traffic control permits may be required during construction.

The City of San Diego would vacate a roadway easement on the project site.

2.5.3 Stormwater Compliance

Prior to construction of the proposed project, a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) is anticipated to be required from the State Water Resources Control Board.

3.0 Environmental Factors Potentially Affected

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

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

4.0 Determination

On the basis of this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
■	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

July 14, 2022

Signature

Date

Denis Desmond, Director of Planning
San Diego Metropolitan Transit System

5.0 Environmental Initial Study Checklist

This IS checklist identifies potentially significant effects to biological resources, cultural resources, hazards and hazardous materials, noise, and tribal cultural resources for the proposed project. The implementation of mitigation measures identified in this IS would ensure potentially significant impacts are less than significant with mitigation incorporated. All other environmental impacts would be less than significant, or no impact would occur. MTS and SANDAG have not adopted thresholds for use in CEQA documents where they are the Lead Agency or Responsible Agency. In the absence of MTS/SANDAG adopted thresholds, the analysis in this IS checklist relies on Appendix G of the CEQA Guidelines and in some cases (as specified and where relevant to the particular impact), the City of San Diego's (2020) guidelines for determining significance, which are based on Appendix G of the CEQA Guidelines. The following impact conclusion definitions are from Appendix G of the CEQA Guidelines and are used throughout the IS checklist:

- "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- "Less Than Significant With Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

- "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

- "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

I. Aesthetics

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	■
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	■
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	■	☐

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. 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 1998) 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 1998). 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. No impact would occur.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no officially designated state scenic highways in the vicinity of the project site. The nearest officially designated state scenic highway is the segment of SR 163 that extends through Balboa Park, which is approximately 3.25 miles west of the project site. The nearest eligible state scenic highway not officially designated is I-5, which is approximately three miles west of the project site (Caltrans 2022). At these distances, project elements would not affect views from SR 163 or I-5. In addition, the project site is completely developed and does not contain notable scenic resources, such as large stands of mature trees or rock outcroppings. While there are nine existing buildings on the project site that would be removed, none are considered historic (HELIX 2022b) or exhibit aesthetic features. Therefore, the proposed project would not substantially damage scenic resources including those within a state scenic highway. No impact would occur.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. Public Resources Code (PRC) 21071 defines the term "urbanized area" for the purpose of CEQA to mean an incorporated city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. According to U.S. Department of Commerce Bureau of the Census (U.S. Census Bureau) data from 2021, the City of San Diego has a population of 1,381,611 (U.S. Census Bureau 2021). Thus, the project site is within an urbanized area as defined by PRC 21071 and is therefore evaluated relative to applicable zoning and other regulations governing scenic quality.

The project site is zoned for light industrial uses, with the western portion of the site (west of the FedEx driveway) zoned IL-3-1 and the eastern portion of the site (east of the FedEx driveway) zoned IL-2-1. Zone IL-2-1 allows for a mix of light industrial and office uses with limited commercial uses, and the IL-3-1 zone allows for a mix of light industrial, office, and commercial uses. Vehicle repair and maintenance facilities are a permitted use in both of these IL zones pursuant to the use regulations in San Diego Municipal Code Section 131.0622, Table 131-06B. While MTS is statutorily exempt from local zoning requirements, design of the proposed project would endeavor for consistency with applicable development regulations of the underlying IL zones pertaining to visual character, such as height limitations and setbacks. Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality. No impact would occur.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Less Than Significant Impact. There are two primary artificial sources of light that generally affect an urban environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear night 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 are also existing sports lighting at the baseball fields in Sunshine Bernardini 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. Light impacts would be less than significant.

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. Glare impacts would be less than significant.

II. Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	■
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non- forest use?	☐	☐	☐	■

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Farmland Mapping and Monitoring Program (FMMP) is a statewide program that designates farmland among several categories, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. The FMMP is maintained by the California Department of Conservation (DOC) and is the agency responsible for overseeing farmland classification throughout the state. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. Unique farmland is land, other than Prime Farmland, which has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is Farmland of Local Importance. The project site does not include farmland and would continue to support an industrial land use. According to the FMMP online mapping database (DOC 2016), the project site is classified as Urban and Built-Up Land and does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the project would not convert Farmland to non-agricultural use. No impact would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses.

As stated in item II(a), the project site is located in an area classified by the DOC as Urban and Built-Up Land where neither farmland nor agricultural resources are present. The project site is zoned as IL-2-1 and IL-3-1, which indicates that the desired land uses are light industrial and those compatible with light industrial. Additionally, the project site is not encumbered by a Williamson Act Contract and would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. PRC Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or within its vicinity. There are some scattered trees throughout the site; however, there is no concentration of trees within the site that would constitute a forest. Therefore, the project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned as Timberland Production. No impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated in item II(c), there is no forest land present on site or vicinity. The site has not been historically and is not currently used or planned to be used for forest land. As such, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As stated in items II(a) through II(d), the project site is located in an area where no agricultural resources are present on the project site or immediate vicinity. The site and surrounding area are classified as Urban and Built-Up Land. Additionally, no existing agricultural or forest land uses

are located in the proximity of the project site. Therefore, the project would not involve changes in the existing environment that could result in the conversion of farmland or forest land into non-agricultural or non-forest use. No impact would occur.

III. Air Quality

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

The discussion below is summarized and based on the analysis and conclusions contained within the Air Quality Technical Report (HELIX 2022a) prepared for the proposed project. The report is included as Appendix A to this IS/MND.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The proposed project is located within the San Diego Air Basin (SDAB). Air quality in the SDAB is regulated by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD is the government agency that regulates sources of air pollution within the County. Currently, the SDAB is in "non-attainment" status for criteria pollutants ozone (O_3), 10-micron or less particulate matter (PM_{10}), and 2.5-micron or less particulate matter ($PM_{2.5}$). The federal Clean Air Act (CAA) required the United States Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS), which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The current regional air quality plan for the NAAQS is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). The regional air quality plan for the CAAQS is SDAPCD's 2016 Revision to the Regional Air Quality Strategy for San Diego County (RAQS; SDAPCD 2016). A 2022 update to the 2016 RAQS is currently in progress.

Strategies to achieve these emissions reductions are developed in the Attainment Plan and RAQS, prepared by the SDAPCD for the region. Both the Attainment Plan and RAQS rely on information from

the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the local jurisdictions' general plans would be consistent with the Attainment Plan and RAQS. In the event that a project proposes development that is less intensive than anticipated within the General Plan, the project would likewise be consistent with the Attainment Plan and RAQS. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections upon which the Attainment Plan and RAQS are based, the project would be in conflict with the Attainment Plan and RAQS and might have a potentially significant impact on air quality.

The proposed project is located within the City Heights area of the Mid-City Communities Plan area and is consistent with the land use designation of Industrial and zoning of light industrial (IL-2-1 and IL-3-1). Community plans work together with the General Plan to provide location-based policies and recommendations in the City's 50-plus community planning areas. Community plans are written to refine the General Plan's citywide policies, designate land uses and housing densities, and include additional site-specific recommendations as needed. The proposed project has been designed to be compatible with the existing and potential future uses in the general area. Based on the described conformance with applicable land use and zoning criteria, the project would be in conformance with the Mid-City Communities Plan and would therefore be consistent with the Attainment Plan and RAQS. Thus, impacts associated with consistency with regional air quality plans would be less than significant.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SDAB. The region is a federal and/or state nonattainment area for ozone, PM_{10} and $PM_{2.5}$. MTS and SANDAG have not adopted thresholds for use in CEQA documents where they are the Lead Agency or Responsible Agency. In the absence of MTS/SANDAG adopted thresholds, this analysis relies on the City of San Diego's (2020) guidelines for determining significance, which are based on Appendix G of the CEQA Guidelines. The screening criteria were developed by SDAPCD and the South Coast Air Quality Management District (SCAQMD) with the purpose of attaining the NAAQS and California Ambient Air Quality Standards (CAAQS). The NAAQS and CAAQS identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Therefore, for CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to air quality or have an adverse effect on human health. The screening thresholds are included in Table 1, *Screening-level Thresholds for Air Quality Impact Analysis*.

Table 1
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

Pollutant	Total Emissions Pounds per Hour	Total Emissions Pounds per Day	Total Emissions Tons per Year
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)[1]	---	67	10
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	137	15

Source: City of San Diego 2020

[1] The City of San Diego does not specify a threshold for $PM_{2.5}$. Threshold here is based on SDAPCD Rules 20.1, 20.2, and 20.3.

The proposed project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation.

Construction Emissions

The project's construction emissions were estimated using CalEEMod. Construction was assumed to begin in July 2024 and continue through the end of December 2025 with all construction activities occurring sequentially. Project-specific input was based on information provided by MTS and default model settings to estimate reasonably conservative conditions. Additional details of phasing, selection of construction equipment, and other input parameters, including CalEEMod data, are included in the Air Quality Technical Report (HELIX 2022a; Appendix A).

The results of the calculations for the various phases of project construction are shown in Table 2, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the SDAPCD thresholds.

Table 2
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Year	VOC*	NO_X*	CO*	SO_X*	PM_{10}*	$PM_{2.5}$*
Demolition	2	32	23	<0.5	10	3
Site Preparation	3	27	19	<0.5	10	6
Grading	3	32	28	<0.5	6	3
Building Construction	2	17	21	<0.5	2	1
Paving	4	9	15	<0.5	1	<0.5
Architectural Coatings	35	1	2	<0.5	<0.5	<0.5
Maximum Daily Emissions	**35**	**32**	**28**	**<0.5**	**10**	**6**
Significance Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Air Quality Technical Report (HELIX 2022a; Appendix A)

* Pollutant Emissions (pounds per day)

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 2, emissions of criteria pollutants and ozone precursors from project construction would be below the applicable significance thresholds. Therefore, direct impacts associated with criteria pollutants generated during project construction would be less than significant.

Operational Emissions

The proposed project's operational emissions were also estimated using CalEEMod. The proposed project's operational sources of emissions would include area, energy, transportation, and offroad sources. Operational emissions calculations and model outputs are included in the Air Quality Technical Report (HELIX 2022a; Appendix A). Table 3, *Daily Operational Emissions*, presents the calculated operational emissions for the proposed project.

Table 3
DAILY OPERATIONAL EMISSIONS

Category	VOC*	NO_X*	CO*	SO_2*	PM_{10}*	$PM_{2.5}$*
Area	3	<0.5	<0.5	<0.5	<0.5	<0.5
Energy	<0.5	1	<0.5	<0.5	<0.5	<0.5
Mobile	4	3	30	<0.5	10	3
Offroad	<0.5	1	1	<0.5	<0.5	<0.5
Total Daily Emissions	**7**	**5**	**31**	**<0.5**	**10**	**3**
Significance Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Air Quality Technical Report (HELIX 2022a; Appendix A)
Note: The total presented is the sum of the unrounded values.
* Pollutant Emissions (pounds per day)
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3, emissions of criteria pollutants and ozone precursors associated with the proposed project operations would be below the applicable significance thresholds. Therefore, direct impacts associated with criteria pollutants generated during project operations would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. CARB and the California Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the mostly likely to be affected by air pollution: adults over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005). These groups are considered sensitive receptors. The closest existing sensitive receptors to the project site include Webster Elementary School (approximately 250 feet to the northeast) and single-family residences located east of 47th Street (approximately 400 feet to the east). Impacts to sensitive receptors are typically analyzed for operational period carbon monoxide (CO) hotspots and exposure to toxic air contaminants (TACs). An analysis of the project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hotspots

Localized air quality effects can occur when emissions from vehicular traffic increase in local areas. The primary mobile source pollutant of local concern is CO, which is a direct function of vehicle idling time

and, thus, traffic flow conditions. CO transport is extremely limited—it disperses rapidly with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations proximate to a congested roadway or intersection may reach unhealthful levels affecting local sensitive receptors (residents, school children, the elderly, hospital patients, etc.). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. If a project generates vehicular traffic that increases average delay at signalized intersections operating at Level of Service (LOS) E or F or causes an intersection that would operate at LOS D or better without the project to operate at LOS E of F with the project, the project could result in significant CO hotspot-related effects to sensitive receptors.

According to the Transportation Impact Study (TIS) prepared for the project (VRPA Technologies 2022), all analyzed intersections would operate at LOS D or better with project implementation. The proposed project would not increase average delay at signalized intersections operating at LOS E or F or cause an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project. Furthermore, the bus fleet would consist of ZEBs which do not result in tailpipe emissions of CO. Therefore, the project would not have the potential to result in a CO hotspot, and impacts would be less than significant.

Toxic Air Contaminants

Construction

Diesel engines emit a complex mixture of air pollutants, including gaseous material and diesel particulate matter (DPM). DPM emissions would be released from operation of the on-site construction equipment used for project construction. CARB has declared that DPM from diesel engine exhaust is a TAC. Additionally, the OEHHA has determined that chronic exposure to DPM can cause carcinogenic and non-carcinogenic health effects. For this reason, although other pollutants would be generated, DPM would be the primary pollutant of concern.

The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer time period. According to the OEHHA, health risk assessments (HRAs), which determine the exposure of sensitive receptors to TAC emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with a project.

There would be few pieces of off-road, heavy-duty diesel equipment operating at a given time during project construction, and the construction period would be relatively short, especially when compared to the 30-year exposure period utilized for assessment (as noted above). In addition, the highest daily emission of PM_{10} (which includes equipment emissions of DPM) during construction is estimated to be approximately 10 pounds per day, which would be well below the 100 pounds per day significance level threshold. The significance level thresholds were developed with the purpose of attaining the NAAQS and CAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Combined with the highly dispersive properties of DPM, construction-related emissions would not expose sensitive receptors to substantial emissions of TACs. Impacts from construction emissions would be less than significant.

Operation

CARB siting recommendations within the *Air Quality and Land Use Handbook* suggest a detailed HRA should be conducted for sensitive receptors within 1,000 feet of a warehouse distribution center, within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet of a typical gas dispensing facilities, or within 300 feet of a dry cleaning facility that uses perchloroethylene (PCE), among other siting recommendations (CARB 2005). While the project does include 500 daily bus trips, the entire fleet would consist of electric ZEBs that would not generate TACs on site. The project would not result in conditions with respect to any other CARB siting recommendations associated with exposure of sensitive receptors to TAC emissions such that preparation of an HRA would be warranted. Impacts would be less than significant.

Based on the above analysis, implementation of the project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The State of California Health and Safety Code Sections 41700 and 41705, and SDAPCD Rule 51, prohibit emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Any unreasonable odor discernible at the property line of the project site would be considered a significant odor impact.

The proposed project could produce odors during proposed construction activities from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. Accordingly, the proposed project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

During project operation, the temporary storage of refuse could be a potential source of odor; however, project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City of San Diego's Municipal Code solid waste regulations, thereby precluding significant odor impacts. Furthermore, the proposed project would be required to comply with SDAPCD Rule 51 which prohibits the discharge of odorous emissions that would create a public nuisance. Additionally, while the project does include 500 daily bus trips, the entire fleet would consist of electric ZEBs that would not generate odorous emissions associated with fuel exhaust. As such, long-term operation of the proposed project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

IV. Biological Resources

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	■	☐
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	■	☐
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	■
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	■	☐	☐

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant With Mitigation Incorporated. 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 but also in other areas within the site. 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, but no disturbances or improvements would occur within the adjacent open space area. Thus, no direct impacts to special status species would occur.

Due to the presence of adjacent sensitive habitat, 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 (MSCP) Subarea Plan, which is intended to link all core biological areas into a regional open space (see IV[f] for additional discussion of the MSCP). 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.

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.*

  Best management practices (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 application and/or drainage of such materials into the MHPA.*

  The proposed project does not involve agriculture or creation of recreational areas such as playing fields or any other uses that would introduce toxins, chemicals, or by-products.

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 exceed allowable noise levels at the edge of the MHPA. Mitigation is identified in item XIII(a) that includes installation of temporary noise control barriers at the northern edge of the project site to reduce construction noise levels to acceptable levels within the MHPA (mitigation measure NOI-1). Additionally, stationary equipment at the proposed facility could also generate noise during regular operations that could potentially exceed allowable levels at the MHPA boundary. Mitigation is identified in XIII(a) that includes preparation and implementation of a project operational noise control plan to reduce operational noise levels to acceptable levels within the MHPA (mitigation measure NOI-2). Refer to XIII(a) for additional discussion of potential indirect noise impacts to wildlife. With implementation of mitigation measures NOI-1 and NOI-2, the project would be consistent with this Land Use Adjacency Guideline.

- *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 in excess of allowable levels at the nearby MHPA boundary to the north that could indirectly affect wildlife. The project would implement mitigation measures NOI-1 and NOI-2 that would include appropriate noise control features that would be incorporated into the project design. With implementation of noise control features, the project would be consistent with this Land Use Adjacency Guideline.

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.*

  The project does not propose new development within the MHPA. 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.

Based on the above Land Use Adjacency Guidelines consistency analysis, the project would not result in adverse indirect effects on special status species with implementation of mitigation measures identified in NOI-1 and NOI-2 as identified in item XIII(a). Impacts to species identified as a candidate, sensitive, or special-status species in local or regional plans or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service would be less than significant with mitigation incorporated.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The project site is completely developed and does not contain sensitive habitat. Proposed improvements would occur entirely within the project site and thus, no direct impacts to sensitive habitat would occur. Open space occurs adjacent to the site on the north that contains sensitive habitat, but no disturbances or improvements would occur within the adjacent open space area.

Project construction would occur immediately adjacent to the open space area and near the MHPA beyond (at a distance of approximately 150 feet). Inadvertent intrusion into these adjacent areas by construction vehicles, equipment, and personnel could result in impacts to sensitive habitat. Implementation of standard construction BMPs, such as installation of orange fencing to demarcate the

limits of disturbance and compliance with the MHPA Land Use Adjacency Guidelines as noted above in item IV(a) would ensure that inadvertent impacts to sensitive habitats located immediately adjacent to construction work areas are avoided. Therefore, impacts to riparian habitat or other sensitive natural community would be less than significant.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. The project site is entirely developed and does not contain sensitive habitat, wetlands, or other potentially jurisdictional features. The site borders an open space area to the north that consist of a vegetated slope that transitions to a canyon that is traversed by Chollas Creek. 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. Impacts to wetlands would be less than significant.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The project site is completely developed and is surrounded by existing development to the east, south, and west, and as such, does not by itself function as or contribute to any wildlife corridors or linkages, or native wildlife nursery sites. No native wildlife nurseries are present in the project vicinity. The project is adjacent to open space to the north associated with the Chollas Creek corridor, part of which is located within the MHPA. Chollas Creek is a drainage system that traverses urbanized neighborhoods within the Mid-City (City Heights, Eastern), Encanto Neighborhoods, Southeastern San Diego, and Barrio Logan communities, from its headwaters in La Mesa and Lemon Grove to San Diego Bay. Much of Chollas Creek has been channelized and is largely characterized as an urban creek, but natural sections remain and overall, it provides a large contiguous open space system that supports wildlife movement and functions as a wildlife corridor. The project, however, would not interfere with the function of the Chollas Creek corridor or the MHPA as a wildlife corridor and would not constrain wildlife movement through the area. The project would be constructed entirely within the developed site and would not disrupt the existing habitat corridor along Chollas Creek within the MHPA. In addition, implementation of standard construction BMPs, such as installation of orange fencing to demarcate the limits of disturbance and compliance with the MHPA Land Use Adjacency Guidelines as noted above in IV(a) would ensure that indirect impacts to sensitive habitat within this wildlife corridor are avoided. Impacts to wildlife movement would be less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The proposed project would not conflict with any local policies or ordinances protecting biological resources, including the City of San Diego's Biological Guidelines (City of San Diego 2018) and the Environmentally Sensitive Lands (ESL) Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 1). The project site is entirely developed and does not contain sensitive biological resources or ESL resources protected by the Biological Guidelines and ESL Regulations. No impact would occur.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant With Mitigation Incorporated. The project site occurs within the boundaries of the City of San Diego's adopted MSCP Subarea Plan (City of San Diego 1997) and in close proximity (as close as 150 feet) to the City of San Diego's MHPA. The MSCP is a comprehensive habitat-conservation planning program for southwestern San Diego County. A primary goal of the MSCP is to preserve a network of habitat and open space to protect biodiversity. Local jurisdictions implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms. The MHPA is the planned habitat preserve throughout the MSCP Subregional Plan study area and is assembled as each participating jurisdiction implements their portion of the MSCP. The City of San Diego's MSCP Subarea Plan identifies a 56,831-acre MHPA for preservation of core biological resource areas and corridors targeted for preservation.

The project site is not located within or directly adjacent to the MHPA; however, due to the site's proximity to MHPA lands, the project would be subject to compliance with the MHPA Land Use Adjacency Guidelines. As detailed in IV(a), the project would be consistent with the Land Use Adjacency Guidelines related to drainage, toxics, lighting, barriers, invasive species, brush management, and grading. The project would also be consistent with the Land Use Adjacency Guidelines related to noise upon implementation of mitigation measures (NOI-1 and NOI-2) identified in item XIII(a). Impacts related to consistency with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would be less than significant with mitigation incorporated.

V. Cultural Resources

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	■	☐

The discussion below is summarized and based on the analysis and conclusions contained within the Cultural Resources Survey Report (HELIX 2022b) prepared for the proposed project. The report is included as Appendix B to this IS/MND.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. The Cultural Resources Survey Report conducted a records search, Sacred Lands File search, a review of historic aerial photographs and maps, historic background research, a pedestrian survey, and historic structures evaluation for the proposed project to determine the potential effects on historical resources. The National Register of Historic Places (NRHP) was established by the National Historic Preservation Act to protect historically significant properties. Similarly, the California Register of Historical Resources (CRHR) requires the identification and mitigation of substantial adverse impacts that may affect the significance of eligible historical resources. To be eligible for listing in the NRHP or CRHR, a resource must meet specific criteria which are described in detail in the Cultural Resources Survey Report (HELIX 2022b).

The area surrounding the project site has been disturbed by industrial development, as well as transportation and utility installation, with residential development nearby. The project site was graded in the 1940s, 1950s, and 1960s during the construction of the existing buildings within the parcels. The records search conducted at the South Coastal Information Center yielded 19 previously recorded cultural resources within a half-mile radius of the project, none of which have been recorded within the project area of potential effect (APE), which coincides with the boundaries of the project site. Previously recorded historic resources include the Holy Cross Cemetery and Mausoleum, ten refuse scatters and dumps, and four isolated historic artifacts consisting of glass bottles and a metal toy car.

The project site contains nine existing structures that would be demolished. These existing buildings appear to be older than 45 years and thus warrant a historical evaluation to determine if any are considered a significant historical resource. As such, a historical evaluation was conducted within the APE. Nine structures were observed within the project APE and were determined to be in poor to fair condition. Each structure was assigned a building number, as identified below in Table 4, *Existing On-site Buildings*.

Table 4
EXISTING ON-SITE BUILDINGS

Building Number	APN[1]	Address	Location
1	541-611-34-00	4576 Federal Boulevard 4580 Federal Boulevard	Both addresses refer to the same structure in the southeast corner of the parcel.
2	541-611-34-00 541-611-35-00	4582 Federal Boulevard	This structure is located within the southeast corner of the parcel. The property contains both APNs.
3	541-611-34-00	4586 Federal Boulevard	This L-shaped structure is located at the north end of the parcel.
4	541-611-31-00	4550 Federal Boulevard	This building is the only structure within the parcel.
5	541-611-04-00	4506 Federal Boulevard	This structure is located within the southwestern corner of the APN.
6	541-611-04-00	4510 Federal Boulevard	This structure is located in the northern part of the parcel and is the northwesternmost structure.
7	541-611-04-00	4514 Federal Boulevard	This structure is located in the northeast corner of the parcel.

Building Number	APN[1]	Address	Location
8	541-611-04-00	4520 Federal Boulevard	This structure is located in the southernmost portion of the northeastern area of the parcel.
9	541-611-34-00	4570 Federal Boulevard	This structure is located in the southern section of the parcel.

Source: HELIX 2022b

[1] Refer to Figure 2 for the location of the APNs within the project site.

APN = Assessor's Parcel Number

Four of the structures (Buildings 4, 5, 7, and 8) appeared to be warehouses or distribution centers, two appeared to be metalworking shops (Buildings 2 and 3), one appeared to be used as storage (Building 9), one appeared to be an office or salesroom (Building 6), and one was signed as being an art gallery (Building 1). Eight of the nine structures appeared to be older than 45 years. According to historic aerial photographs and City directory records, one appears to be at least 70 years old (Building 1), three appear to be 58 years old (Buildings 2, 3, 4), two appear to be at least 56 years old (Buildings 5 and 9), and two appear to be at least 48 years old (Buildings 6 and 7). Only one structure, Building 8, appears to be less than 45 years of age. Accordingly, the historical significance evaluation was conducted for Buildings 1 through 7, and 9 under the NRHP and CRHR.

The structures within the APE do not appear eligible for federal or state listing. They are not included on a register of designated properties, and they are not contributors to any designated historic district. Therefore, they do not qualify as historical resources under CEQA. There is no evidence that the demolition of the subject structures within the project site would adversely affect or detract from the historic record of the area. Based on the results of the Cultural Resources Survey Report, no historic properties or historical resources would be affected by implementation of the proposed project. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. No impact would occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant With Mitigation. As noted above in item V(a), the records search conducted for the project identified 19 previously recorded cultural resources within a half-mile of the project site, but none within the project site. Previously recorded prehistoric resources consist of two lithic procurement and reduction areas, a low-density lithic scatter, and a shell scatter. Additionally, a Sacred Lands File search was conducted that involved contacting the Native American Heritage Commission (NAHC) on April 27, 2021 for a list of Native American contacts for the project area. The NAHC indicated in a response, dated May 13, 2021, that the results of the search were negative but noted that this "does not indicate the absence of cultural resources in any project area."

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. However, the Chollas Valley and nearby South Chollas Valley were important travel corridors for the indigenous people, and habitation sites are known within these valleys. Thus, there is potential for buried resources to be present within the APE, including subsurface architectural features or trash deposits associated with

past commercial, industrial, and residential uses. It is possible that construction activities may uncover buried unknown archaeological resources. In the event that subsurface archaeological resources are encountered during construction, such resources could potentially be damaged or destroyed, resulting in a substantial adverse change in the significance of an archaeological resource. As a result, implementation of the proposed project could result in a potentially significant impact to archaeological resources. Implementation mitigation measure CUL-1 would reduce impacts to less than significant levels.

CUL-1 Archaeological and Native American Monitoring Program. The construction contractor shall implement an archaeological and Native American monitoring program during initial grading and other ground-disturbing construction activities. The monitoring program shall include the retention of a qualified archaeologist and a Kumeyaay Native American monitor. The archaeological and Native American monitors shall attend a pre-construction meeting with the construction manager and be in attendance during initial ground disturbing activities at the project site. The monitors shall determine the extent of their presence during soil disturbing activities.

The archaeological and Native American monitors shall have the authority to temporarily halt or redirect grading and other ground-disturbing activity if cultural resources are encountered. If an artifact is encountered, all operations within 50 feet of where the artifact was found shall be suspended immediately, MTS and SANDAG shall be notified, and the qualified archaeologist, in consultation with the Native American monitor, shall evaluate the significance of the find. If cultural material is determined to be significant, the qualified archaeologist shall coordinate with the consulting tribes and MTS and SANDAG staff to develop and implement appropriate treatment measures. Pursuant to California PRC § 21083.2(b), avoidance is the preferred method of preservation. The archaeologist and the tribal representative shall make recommendations to MTS and SANDAG on the measures that will be implemented to protect the newly discovered cultural resource(s), including but not limited to, avoidance in place, excavation, relocation, and further evaluation of the discoveries in accordance with CEQA. No further ground disturbance shall occur in the area of the discovery until MTS and SANDAG approves the measures to protect the significant cultural resource(s).

Impacts to archaeological resources would be less than significant with mitigation incorporated.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. There are no known grave sites within the project limits, and the potential for encountering human remains during construction activities is considered low, since grading and excavation activities would occur within a previously disturbed area. In the unlikely event that human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of any human remains find immediately. If the remains are determined to be prehistoric, the Coroner would notify the NAHC, which would determine and notify a Most Likely Descendant (MLD). The MLD would have the opportunity to make recommendations to the NAHC on the disposition of the remains. Impacts would be less than significant.

VI. Energy

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	■	☐

The discussion below is summarized and based on the analysis and conclusions contained within the Energy Impact Assessment (HELIX 2022c) prepared for the proposed project. The report is included as Appendix C to this IS/MND.

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The project would consume energy resources during construction and operation of the proposed facility. The proposed project's direct electricity and natural gas consumption as well as the indirect electricity consumption from water/wastewater sourcing, transport, and treatment were estimated from the air quality emissions project modeling completed using CalEEMod. Fuel consumption factors in terms of gallons per hour of diesel for off-road equipment were calculated using data from the CARB Mobile Source Emissions Inventory online database–OFFROAD2021. Energy usage from transportation sources was based on information from the project TIS (VRPA Technologies 2022).

Construction Energy

Energy consumed for project construction would primarily consist of fuels in the form of diesel and gasoline. Fuel consumption would result from the use of on-road trucks for the transportation of construction materials and water, construction worker vehicles traveling to and from the project site, and from the use of off-road construction equipment. The estimated fuel and total energy consumed during project construction is shown in Table 5, *Construction Energy Use*.

Table 5
CONSTRUCTION ENERGY USE

Source	Gallons Diesel	Gallons Gasoline	MMBtu
Off-Road Construction Equipment	18,047	-	2,508
On-Road Construction Traffic	5,435	19,382	3,159
Total[1]	**23,482**	**19,382**	**5,667**

Source: HELIX 2022c

[1] Totals may not sum due to rounding.

MMBtu = million British thermal units

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. The petroleum consumed during project construction would be typical of similar projects and would not require the use of new petroleum resources beyond those typically consumed in California annually for construction activities. Based on these considerations, construction of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources and the impact would be less than significant.

Operational Energy

During long-term operation of the project, energy would be consumed in the form of diesel and gasoline used by employee vehicles traveling to and from the project site (buses would be all electric so would not consume energy associated with fuels), natural gas for heating and hot water, electricity required to source and treat water used by the project, and electricity used directly by the project (including electricity to charge the buses). The project's electricity use calculation accounts for the on-site solar generation requirement, which is required per 2022 Title 24 standards. The project's estimated annual operational energy use (for the first full year of operation—2026) in gallons of fuel, electricity, and equivalent million British thermal units (MMBtu) is shown in Table 6, *Operational Energy Use*.

Table 6
OPERATIONAL ENERGY USE

Source	Diesel (gallons)	Gasoline (gallons)	Electricity (kWh)	Total Energy (MMBtu)
Mobile	29,077	12,766	-	5,625
Natural Gas	-	-	-	1,947
Water/Wastewater	-	-	305,256	1,042
Direct Electricity Use	-	-	3,700,806	12,628
Total[1]	29,077	12,766	**3,701,111**	**21,241**

Source: HELIX 2022c

[1] Totals may not sum due to rounding.

kWhr = kilowatt-hours; MMBtu = million British thermal units

As shown in Table 6, the project would result in an annual energy consumption of approximately 21,241 MMBtu. While the proposed project would result in the consumption of gasoline, diesel, electricity, and natural gas, the additional consumption would be consistent overall with the energy projections for the state and the region to meet the demands of anticipated future residential growth in the state and region. According to the project TIS (VRPA Technologies 2022; Appendix J of this IS/MND), the regional average vehicle miles traveled (VMT) per employee is 18.9 miles per day. The project employees would have a VMT of 15.3 miles per day, 19.1 percent below the regional average. Therefore, the project would likely result in a regional decrease in VMT, and a decrease in the associated per capita consumption of transportation fuels for the region. Furthermore, the project is a mass transit project aimed at reducing overall regional VMT through increased ridership with a bus fleet consisting of energy efficient ZEBs. Implementation of the project would not require the construction of new regional facilities and sources of energy. Therefore, operation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The 2022 Title 24 Part 6, Building Energy Efficiency Standards, and 2019 Title 24 Part 11, CALGreen, include provisions applicable to all buildings, which are mandatory requirements for efficiency and design. The project would be consistent with the requirements of Title 24 through implementation of energy-reduction measures, such as energy efficient lighting and appliances, water efficient appliances and plumbing fixtures, water efficient landscaping and irrigation, and the onsite generation of renewable solar energy. Additionally, the project is a mass transit project aimed at reducing overall regional VMT through increased ridership with a bus fleet consisting of energy efficient ZEBs. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	■	☐
ii. Strong seismic ground shaking?	☐	☐	■	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
iv. Landslides?	☐	☐	☐	■
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	■	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	■	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	■	☐

The discussion below is based on the Geotechnical Desktop Study prepared for the proposed project (Allied Geotechnical Engineers 2022a). This report is included as Appendix D to this IS/MND.

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

Less Than Significant Impact. Seismically induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows preexisting faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by shaking. Under the Alquist-Priolo Earthquake Fault Zoning Act (Act), the California State Geologist identifies areas in the State that are at risk from surface fault rupture. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act also requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps that identify these zones.

According to the Geotechnical Study, there are no known active faults mapped near the project site. Active faults are those faults which have had surface displacement within Holocene times (about the last 11,000 years). 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. Other sources of potential seismic risk include the major regional active faults with recurring magnitude 4.0 and greater earthquakes, such as the Coronado Bank and Elsinore fault zones, which are located about 18 miles to the west-southwest and 36 miles to the northeast, respectively. Other more distant, faults that could pose a potential source of seismic activity in the San Diego metropolitan area include the offshore located San Diego Trough and San Clemente fault zones and the San Jacinto and San Andreas fault zones to the east.

The project site is 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. Based on the California Division of Mines and Geology fault classification criteria, the La Nacion fault zone may be considered "potentially active," meaning that it has 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). Consequently, 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 (as noted above). 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. Adherence to the recommendations in the Geotechnical Study and compliance with CBC seismic design parameters would ensure that people are not exposed to substantial adverse effects, including risk of loss, injury, or death, involving rupture of a known earthquake fault. Impacts related to fault rupture would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is located in a seismically active region and is likely to be subjected to moderate to severe seismic ground shaking in response to a major earthquake occurring on the Rose Canyon fault zone or another major regional active fault, as identified in item VII(a)(i). An earthquake along any of these known active fault zones could result in severe ground shaking, and consequently cause injury and/or property damage in the project vicinity. However, the proposed project would be designed to comply with current seismic design standards in accordance with the CBC, where applicable, to avoid adverse effects related to strong seismic ground shaking. Compliance with applicable seismic design criteria would ensure that people are not exposed to substantial adverse effects, including risk of loss, injury, or death, involving strong seismic ground shaking. Impacts related to strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Seismic-induced soil liquefaction is a phenomenon during which loose, saturated granular materials undergo matrix rearrangement, develop high pore water pressure, and lose shear strength due to cyclic ground vibrations induced by earthquakes. Manifestations of soil liquefaction can include loss of bearing capacity below foundations, surface settlements and tilting in level ground, and instabilities in areas of sloping ground. Soil liquefaction can also result in increased lateral and uplift pressures on buried structures.

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 such that people would not be exposed to substantial adverse effects, including risk of loss, injury, or death, involving liquefaction. Impacts associated with seismic-related ground failure, including liquefaction would be less than significant.

iv. Landslides?

No Impact. Based on a review of published geologic maps, there are no known historical landslides in the project area. Furthermore, the San Diego Seismic Safety Study Geologic Hazards and Faults map (City of San Diego 2008b) indicates the project site is not located in an area that is susceptible to landslide hazards. Thus, the proposed project would not expose people to substantial adverse effects, including risk of loss, injury, or death, involving landslides. No impact would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil exposed by construction activities could be subject to erosion if exposed to heavy rain, winds, or other storm events. There is the potential for soil erosion or loss of topsoil during construction activities as the ground is cleared and graded. Compliance with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit would include preparation of a Storm Water Pollution Prevention Plan (SWPPP) that requires implementation of standard erosion control practices and construction BMPs to prevent soil erosion and loss of topsoil from construction activities. BMPs may include the use of silt fencing, fiber rolls, and sandbags.

The proposed project would not result in long-term, operational impacts associated with soil erosion or loss of topsoil as the site would be almost entirely paved and would not contain a substantial amount of exposed soil. 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. Therefore, impacts related to soil erosion and the loss of topsoil would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed in items VII(a)(iii) and VII(a)(iv) above, the project site would not be subject to risks associated with liquefaction and landslides. Lateral spreading occurs when an underlying soil layer liquefies, and blocks of overlying surficial soil displace downslope or towards a sloping surface or unsupported "free face" such as riverbank. The lateral displacement typically ranges from a few inches to several feet and can cause severe damage to structures. Although the project site lies above Chollas Creek, due to the presence of very hard formational materials and the lack of shallow groundwater condition, the risk of lateral spreading impacting the project site is considered to be very low. For these same reasons, the project site is not located on an unstable geologic unit or at risk to experience subsidence or collapse. Impacts related unstable geologic units or soils would be less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. The majority of soil that underlies the project site is anticipated to be non-expansive with a low expansion potential (Allied Geotechnical Engineers 2022a). However, highly expansive clayey soils of mudstone deposits are mapped within the project area and while it is anticipated that these soils would have been removed at the site during the original site grading and development, it is possible that these soils could be encountered on the site. Should these soils be

encountered, they would be removed from the building areas, as recommended in the Geotechnical Study. In addition, the project would incorporate standard engineering techniques in accordance with the CBC to avoid adverse effects of expansive soils. Therefore, the proposed project would not be located on expansive creating substantial risks to life or property. Impacts related to expansive soils would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed project does not include the use of septic tanks or alternative wastewater disposal systems. The project would connect to the existing sewer infrastructure within the project area. No impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Mapped geologic units within the project area include the early Pleistocene to late Pliocene San Diego Formation and very old paralic deposits (unit 8) of the middle to early Pleistocene age. Based on a review of historical topographic maps and aerial photographs, the majority of the project site itself is anticipated to be underlain by artificial fill materials at various depths. Artificial fill materials are assigned a zero sensitivity rating for paleontological resources. The San Diego Formation is assigned a high sensitivity rating, and the very old paralic deposits (unit 8) are assigned a medium sensitivity rating (City of San Diego 2020).

Ground-disturbing activities associated with the proposed project are anticipated to occur in previously graded and disturbed areas that are underlain by artificial fill materials. Encroachment into the underlying formational geologic units of the San Diego Formation or very old paralic deposits is not anticipated. As such, the potential for encountering intact paleontological resources during ground-disturbing activities is considered very low. Impacts to paleontological resources or unique geological features would be less than significant.

VIII. Greenhouse Gas Emissions

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	■

The discussion below is based in part on the Climate Action Plan (CAP) Consistency Checklist prepared for the proposed project (HELIX 2022d), which is included as Appendix E to this IS/MND.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as greenhouse gases (GHGs) because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere. The GHGs defined under California's Assembly Bill 32 (AB 32) include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Global climate change impacts are by nature cumulative; direct impacts cannot be evaluated because the impacts themselves are global rather than localized impacts.

Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. MTS and SANDAG have not adopted thresholds for use in CEQA documents where they are the Lead Agency or Responsible Agency. In the absence of MTS/SANDAG adopted thresholds, this analysis relies on the City of San Diego's (2020) approved guidelines for determining significance, which are based on Appendix G of the CEQA Guidelines.

The City of San Diego's GHG emission reduction plan, called the Climate Action Plan (CAP; City of San Diego 2015), quantifies existing GHG emissions as well as projected emissions for the years 2020, 2030, and 2035 resulting from activities within the City's jurisdiction. With implementation of the CAP, the City aims to reduce emissions 40 percent below the baseline to approximately 7.8 million metric tons (MMT) of carbon dioxide equivalent (CO_2e) by 2030, and 50 percent below the baseline to approximately 6.5 MMT CO_2e by 2035.

The City of San Diego's CAP Consistency Checklist, adopted July 12, 2016 (most recently revised June 2017), provides a streamlined review process to determine on a project-by-project basis if new development is consistent with the underlying assumptions in the CAP to ensure that the specified emissions targets identified in the CAP are achieved. The CAP Consistency Checklist includes a three-step process to determine if the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

A CAP Consistency Checklist was prepared for the project (HELIX 2022d). Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Community Plan land use and zoning designations for the site. The project site has a land use designation of Industrial in the Mid-City Communities Plan and is zoned as Light Industrial (IL-2-1 and IL-3-1). The project proposes the construction of bus maintenance facility, which is consistent with the Industrial land use designation and the Light Industrial zoning designation. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP.

Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. In particular, the project would facilitate mass transit and provide zero emission buses for transit riders to help the region achieve GHG reduction goals. Thus, the project is consistent with the CAP strategies. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use plan amendment or a rezone.

Based on the above analysis, the project would be consistent with the CAP and would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. As discussed above in item VIII(a), the project is consistent with the existing General Plan and Community Plan land use and zoning designations for the project, and is consistent with the applicable GHG emissions reduction strategies of the CAP. The CAP has been developed in response to State legislation and policies that are aimed at reducing California's GHG emissions. These include Executive Order (EO) S-3-05, which established the 2050 statewide GHG reduction target of 80 percent below 1990 levels; EO B-30-15, which established the 2030 statewide GHG reduction target of 40 percent below 1990 levels; and Assembly Bill 32, the Global Warming Solutions Act (AB 32), which tasked CARB with creating the Climate Change Scoping Plan (Scoping Plan) to establish a 2020 interim target and to provide a path for local governments to contribute their fair share of the GHG emission reductions necessary to achieve the target. Additionally, Senate Bill 32 (SB 32) was enacted subsequent to adoption of the CAP and extended California's GHG reduction programs beyond 2020.

As the project is consistent with the assumptions for relevant CAP strategies toward achieving GHG reduction targets (as described in item VIII[a]), it would not generate emissions that would adversely affect statewide attainment of GHG emission reduction goals pursuant to EO S-3-05, EO B-30-15, AB 32, and SB 32. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. No impact would occur.

IX. Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	■	☐	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	■	☐	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	■	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	■	☐
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	■	☐

The discussion below is based in part on the Phase I Environmental Site Assessment (ESA) prepared for the proposed project (Allied Geotechnical Engineers 2022b). This report is included as Appendix F to this IS/MND.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Materials and waste are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The term "hazardous material" is defined in the State Health and Safety Code (Chapter 6.95, Section 25501[o]) as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment. Hazardous waste is defined as any hazardous material that is abandoned, discarded, or recycled, as defined in the State Health and Safety Code (Chapter 6.95, Section 25125). The transportation, use, and disposal of hazardous materials, as well as the potential releases of hazardous materials to the environment, are closely regulated through many state and federal laws.

During the project construction period, hazardous substances used to maintain and operate construction equipment (such as fuel, lubricants, adhesives, and solvents) would be present. The use of these materials could potentially result in significant impacts through accidental discharge associated with use and storage of hazardous materials. The transport, use, and disposal of hazardous materials and/or wastes would be conducted in accordance with applicable federal and state laws. In addition, implementation of the proposed project would require conformance with the NPDES Construction

General Permit. Specifically, this would entail implementation of a SWPPP to address the use of hazardous materials and the potential discharge of contaminants including construction-related hazardous wastes through the installation of appropriate BMPs. While specific BMPs would be determined during the SWPPP process, the suite of BMPs would include standard industry measures and guidelines contained in the NPDES Construction Permit text and Stormwater Best Management Practices Construction Handbook (California Stormwater Quality Association 2019). Based on compliance with applicable regulations and implementation of appropriate BMPs, hazardous material impacts related to construction activities would be less than significant.

Operation of the proposed project would include the storage and use of hazardous materials and wastes associated with automotive maintenance (e.g., solvents, cleaners, oils, lubricants, and paint), as well as rechargeable batteries for the electric buses that typically contain lithium. MTS is required to comply with applicable federal, state, and local regulations related to the use, transport, storage, and disposal of hazardous materials (including bus batteries), which would minimize potential impacts related to hazardous materials. For example, hazardous materials or wastes stored on site are subject to requirements associated with accumulation time limits, amounts, proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. With compliance with applicable mandatory regulations, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant With Mitigation Incorporated. Hazardous materials releases can occur if there are existing hazardous materials at the project site that would be disturbed by project construction or operation, or if project construction or operation activities involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions. A Phase I ESA was conducted for the project that included a records review and site reconnaissance (Allied Geotechnical Engineers 2022b). 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[3] 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. Implementation of mitigation measures HAZ-1 and HAZ-2 would reduce impacts to below a level of significance.

[3] 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.

HAZ-1 Phase II ESA. 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 Code of Federal Regulations, Title 40, Section 261.24, a remediation plan shall be prepared. The remediation plan shall 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 shall be reviewed and approved by the County of San Diego Department of Environmental Health and Quality and implemented prior to the commencement of construction.

It is not feasible to conduct the Phase II ESA at this time because neither MTS nor SANDAG have legal access to the proposed project site in order to conduct such testing.

HAZ-2 Community Health and Safety and Soil Management Plan. Prior to the start of demolition and earthwork activities, the construction contractor shall prepare a Community Health and Safety Plan and a Soil Management Plan for review and approval by SANDAG to address the monitoring, testing, and handling of heavy metal- and hydrocarbon-contaminated soil or groundwater and burn ash, if encountered during construction activities.

In addition, 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. Associated construction-related impacts from demolition activities would be potentially significant. Implementation of mitigation measure HAZ-3 would reduce impacts to below a level of significance.

HAZ-3 Asbestos-Containing Materials and Lead-Based Paint Survey and Disposal. Prior to demolition, an asbestos and lead survey shall 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 shall 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. A letter report summarizing the conclusions and recommendations of the asbestos and lead survey shall be prepared and submitted to SANDAG.

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 maintenance. The level of risk associated with the accidental release of these hazardous substances is not considered significant 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 Code of Federal Regulations 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.

Impacts with respect to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant with mitigation incorporated.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant With Mitigation Incorporated. Webster Elementary School is located less than one-quarter mile to the northeast. The proposed project would involve the temporary use and/or storage of fuels, oils, and other potential hazardous materials typically used during construction, and ongoing use/storage of lithium batteries, solvents, cleaners, oils, lubricants, and paint during operation. No acutely hazardous materials would be used. The project's use of hazardous materials during construction would be handled in accordance with NPDES SWPPP requirements, as well as compliance with applicable federal, state, and local regulations associated with hazardous materials. Similarly, the use of hazardous materials (including bus batteries) during ongoing operations would also be required to comply with applicable federal, state, and local regulations. Adherence to applicable regulations would avoid exposure to construction-related and operational hazardous materials from occurring to nearby schools.

As discussed in item IX(b), however, the existing on-site buildings that would be demolished could potentially contain asbestos and/or lead-based paint. If present, people at nearby schools could potentially be exposed to emissions of these hazardous materials during demolition activities. Implementation of mitigation measure HAZ-3 identified above in item IX(b) would reduce this impact to below a level of significance. Impacts related to emissions or handling of hazardous materials, substances, or wastes near schools would be less than significant with mitigation incorporated.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant With Mitigation Incorporated. A search of federal, state, and local environmental regulatory agency databases, compiled pursuant to Government Code Section 65962.5, was conducted by Environmental Data Resources (EDR) as part of the project Phase I ESA. The database review identified a total of 35 recognized environmental conditions (RECs) sites/cases in the project area (beyond the project site) that are considered to pose a minimal risk to the project site. These sites/cases

previously or currently have underground and/or above ground storage tanks, documented leaking underground storage tanks leaks/releases, documented major spills, environmental site investigations, mitigations and/or cleanups, and past solid waste landfills/burn ash facilities. These cases/sites are generally considered to pose minimal risk to the project site based on the following factors:

- Age and status of the case;
- Unauthorized releases at the site impacted soil only;
- Distance of the site from the project site;
- Direction of groundwater at the site is away from the project site; and
- Depth of groundwater or lack of groundwater.

Refer to Table 1 in the Phase I ESA for details regarding these 35 REC sites/cases.

There are no known reported unauthorized releases of hazardous materials or wastes at the project site. The Phase I ESA identified one REC site/case within the project area that is considered to have a high potential to impact the project. This site is listed as Charlie's Place Landfill, located at 4674 Federal Boulevard, which was a former bun ash dump site. The precise location of this site is unknown. Agency records suggest that the landfill was located north of the project site on a site currently occupied by a FedEx warehouse. The site address in the listing however suggests that this listed site was actually located on the project site, likely either on the surface parking lot east of the FedEx driveway or the parcel just west of the FedEx driveway. The REC site consists of a closed and illegally abandoned burn ash facility that was used prior to the institution of regulations for solid waste facilities. Documents report that burn ash operations occurred from the early 1930s to the early 1940s. Potential contaminants of concern in burn ash deposits typically include lead, dioxins, and chlorinated hydrocarbons. A review of historic aerial photographs indicates that extensive grading was performed in the late 1970s to mid-1980s prior to the construction of the FedEx facility, with some grading also occurring on adjacent portions of the project site. It is presumed that prior grading operations would have included the removal of burn ash deposits. However, as noted in item IX(b), the potential to encounter burn ash deposits during project construction remains. Implementation of mitigation measures HAZ-1 and HAZ-2 identified in item IX(b) would reduce impacts to below a level of significance. Impacts related to listed hazardous materials sites would be less than significant with mitigation incorporated.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project site?

Less Than Significant Impact. The nearest airport to the project site is the San Diego International Airport (SDIA), located approximately five miles to the northwest. As identified in the SDIA Airport Land Use Compatibility Plan (ALUCP), the project site is located within the Airport Influence Area (AIA) of SDIA, but within Review Area 2, which lies outside of the 60-decibel community noise equivalent level noise contour and the outer boundary of all safety zones (San Diego Regional Airport Authority 2014). Thus, people at the project site would not be at risk for aircraft safety hazards or exposed to excessive noise from aircraft operations. Furthermore, the project does not propose features that could result in hazards impacts on aircraft safety or operation. Impacts would be less than significant.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Access to surrounding roadways would be maintained throughout the construction period. Identified emergency evacuation routes in the vicinity, including I-5, SR 52, I-805, and SR 163 would not be affected during construction or operation. Site access would be provided by up to four driveways from Federal Boulevard, and the project would install a new traffic signal at the western-most driveway to facilitate bus ingress/egress. Based on the TIS prepared for the project (VRPA Technologies 2022), the additional buses and automobiles traveling on Federal Boulevard and other nearby streets would not cause severe congestion that would impede emergency response. Impacts related to impairment of emergency response plans or emergency evacuation plans would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The potential for wildland fires represents a hazard, particularly on undeveloped properties or where development exists adjacent to open space or within proximity to wildland fuels. State law requires that all local jurisdictions identify Very High Fire Hazard Severity Zones (VHFHSZ) within their areas of responsibility (California Government Code Sections 51175–51189). These maps, which are prepared by the local agency in collaboration with the California Department of Forestry and Fire Protection (CAL FIRE) determine fire hazards zones based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

The project site is located in a developed area but is adjacent to open space along Chollas Creek. Given the proximity to this open space canyon, portions of the site are located within an area designated as a VHFHSZ by the City of San Diego Fire-Rescue Department (City of San Diego 2022). The project however would not increase the potential for wildfires in the project area, as the site is already entirely developed, and the project would replace existing structures with new ones. The new buildings and other proposed site improvements would be required to comply with applicable wildland fire risk reduction and prevention requirements of the CBC and the California Fire Code. The project therefore would not increase or exacerbate exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires in the project area. Impacts would be less than significant. See Section XX, *Wildfire*, for additional discussion of wildfire.

X. Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i. Result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
	ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	☐	☐	■	☐
	iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	☐	☐	■	☐
	iv. Impede or redirect flood flows?	☐	☐	■	☐
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	■
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

The discussion below is based in part on the Preliminary Drainage Study (Nasland Engineering 2022a) and Stormwater Quality Management Plan (SWQMP; Nasland Engineering 2022b) prepared for the proposed project. These reports are included as Appendices G and H to this IS/MND, respectively.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The project is subject to compliance with applicable elements of the Clean Water Act (CWA) and NPDES requirements. CWA Section 402 establishes the NPDES for regulating the discharge of pollutants into waters of the U.S. Specific NPDES requirements associated with the proposed project include conformance with General Permit for Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Municipal Permit, NPDES No. CAS 00000004, State Water Resources Control Board Order No. 2013-0001-DWQ, as amended by Order Nos. 2015-0133-EXEC, 2016-0069-EXEC, WQ 2018-0001-EXEC, WQ 2018-0007-EXEC, and 2017-XXXX-DWQ) (the "Small MS4 Permit"). The project would be subject to storm water regulations under the MTS Small MS4 Permit.

The project would also be required to adhere to the NPDES Construction General Permit (NPDES No. CAS000002, SWRCB Order No. 2009-0009-DWQ; as amended by Order No. 2010-0014-DWQ and Order

No. 2012-0014-DWQ), administered by the Regional Water Quality Control Board (RWQCB) during construction, which includes BMPs that serve to protect water and groundwater quality. Preparation of a SWPPP would be required in compliance with the Construction General Permit, which would identify erosion control and sediment control BMPs that would be implemented to avoid adverse effects to water quality. The project is a redevelopment project that creates and/or replaces 5,000 sf or more of impervious surface. As a result, the project is considered a "Regulated Project" under the Small MS4 Permit. Accordingly, a SWQMP has been prepared. The SWQMP includes construction and post-construction BMPs in compliance with the Small MS4 Permit such as source control and biofiltration. Implementation of construction and post-construction BMPs under the SWQMP would further avoid potential violations of applicable standards and discharge violations.

In addition to CWA NPDES requirements, states are required to identify and document polluted surface water bodies, with the resulting documentation referred to as the CWA Section 303(d) List of Water Quality Limited Segments. This list of water bodies identifies the associated pollutants and total maximum daily loads (TMDLs), along with projected TMDL implementation schedules/status. A TMDL establishes the maximum amount of an impairing substance or stressor that a water body can assimilate and still meet water quality standards and allocates that load among pollution contributors. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego region. The receiving waters for the project site that are currently listed as impaired (based on the 2020 303[d] List) include Chollas Creek and San Diego Bay. Chollas Creek is listed for pollutants including copper, diazinon, indicator bacteria, lead, and zinc (RWQCB 2020). The San Diego Bay is listed for polychlorinated biphenyls. Implementation of the BMPs in the SWQMP would ensure that the proposed project would not create adverse water quality impacts to Chollas Creek and downstream receiving waters of the San Diego Bay.

Compliance with the requirements of the CWA (including Section 402 [NPDES requirements] and Section 303 [impaired water segments], and NPDES Construction General Permit) would ensure that the proposed project would not violate any water quality standards or waste discharge requirements. Furthermore, the proposed project would not require the use of or otherwise substantially impair groundwater quality or interfere with groundwater recharge. Impacts would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The proposed project would not require the use of, or otherwise substantially interfere with, groundwater supplies or recharge compared to existing conditions. The project would not involve any long-term use of groundwater and would connect to the City of San Diego's municipal system, which purchases water from the San Diego County Water Authority, the regional wholesale water provider. In all, groundwater comprises a very small portion of the San Diego County Water Authority (SDCWA) water portfolio (five percent). In addition, the City of San Diego Urban Water Management Plan (UWMP; City of San Diego 2020) serves as a planning tool to document existing and future water demands and identify deficiencies and surpluses in relation to planning projections. The City of San Diego's General Plan land use designations work in concert with the UWMP in accurately forecasting water demands. As the proposed project is consistent with the General Plan land uses for the site (industrial), the water demands have been accounted for in the UWMP. Thus, since the project would have a similar demand for water as the existing land uses and that the proposed land uses are accounted for in the UWMP, the project's water demand would not substantially deplete groundwater supplies.

In relation to impervious surfaces that could interfere with groundwater recharge, the project site is currently developed and almost entirely paved and would remain so with the proposed project. Although project implementation would result in a net increase in impervious surfaces by approximately four percent, the project would result in a minimal change to groundwater recharge and the runoff would be conveyed to the proposed on-site drainage system.

The groundwater table is estimated to be at depths of greater than 100 feet below the ground surface (Allied Geotechnical Engineers 2022a). Although the proposed project would require some grading, it would not be at depths deep enough to encounter or interfere with groundwater. As a result, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Existing drainage on the project site sheet flows across the site to either gutter and catch basins within Federal Boulevard or to an existing on-site inlet and storm drain outfall that discharges flow to the slope and canyon area and into Chollas Creek to the north. 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, treated before released off site, and conveyed to existing facilities in Federal Boulevard and the storm drain outfall to the north. The increase in impervious area associated with the project (approximately four percent) would increase the 50-year and 100-year on-site peak storm flows within the localized basins by approximately one cubic foot per second (cfs). This change represents an approximately two percent increase in peak storm flows, which would not adversely affect the project area or downstream areas associated with substantial erosion or siltation. Post-development site conditions would not change applicable regulatory mechanisms with regard to erosion or siltation.

In addition, the project would comply with applicable storm water regulations associated with MTS' Small MS4 Permit and would be required to prepare a SWPPP that would further reduce the potential for substantial erosion and siltation during construction and project operation, as discussed in item VII(b). Therefore, the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed above in item X(c)(i), the proposed project would not substantially alter the overall existing drainage patterns. Project development would result in a minimal increase in peak runoff volumes (approximately one cfs). This change is considered a negligible increase and would not result in flooding on the project site or downstream areas. Therefore, the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface

runoff in a manner in a manner which would result in flooding on- or off site. Impacts would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed under items X(c)(i) and X(c)(ii), the net increase in impervious areas would increase the on-site 50-year and 100-year peak storm flows by approximately one cfs, which represents only an approximately two percent increase in peak storm flows. This increase in runoff volumes generated by the project is not anticipated to exceed the capacity of existing or proposed drainage facilities. Estimated existing and proposed peak flows of the 50-year and 100-year storm events are summarized in Table 7, *Existing and Proposed Runoff Volumes*.

Table 7
EXISTING AND PROPOSED RUNOFF VOLUMES

Storm Event	Federal Boulevard Runoff Volume (cfs)	Storm Drain Outfall Runoff Volume (cfs)
Existing 50-year	19.63	25.91
Proposed 50-year	25.41	21.23
Net	*+5.78*	*-4.68*
Net from Site (% increase)	1.1 (2.4%)	
Existing 100-year	21.23	27.88
Proposed 100-year	27.30	22.78
Net	*+6.07*	*-5.10*
Net from Site (% increase)	0.97 (2.0 %)	

Source: Nasland Engineering 2022a
cfs = cubic feet per second

As shown, runoff volumes discharged from the storm drain outfall to the north would decrease (for both 50-year and 100-year events) with project implementation as the project would convey a majority of on-site flows toward Federal Boulevard to existing storm drain facilities of the municipal storm drain system. Although flow volumes would increase along Federal Boulevard, the existing gutter and inlets along Federal Boulevard are anticipated to accommodate the additional volumes.

As discussed in item X(a), implementation of construction and post-construction BMPs would ensure that the proposed project would not create adverse water quality impacts related to the discharge of pollutants into Chollas Creek and downstream receiving waters, including the San Diego Bay.

Thus, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

iv. Impede or redirect flood flows?

Less Than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center (FEMA 2012), the project site is not mapped within a flood hazard area or special flood hazard area. However, the northern portion of the project site borders a slope that descends towards the Chollas Creek floodplain. This area is within the channel of the stream and adjacent floodplains. 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 would not impede or redirect flood flows. Impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact. As discussed above in item X(c)(iii), the project site is not mapped within a FEMA flood hazard or special flood hazard area (FEMA 2012). Therefore, impacts related to flood hazards would not occur. Tsunamis are usually caused by displacement of the ocean flood causing large waves and are typically generated by seismic activity. The proposed project is located approximately four miles inland from the Pacific Ocean and is not located within a designated tsunami inundation zone. Therefore, there is little to no potential risk from a tsunami inundating the project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The nearest body of water, Chollas Reservoir, is approximately one mile away, which is too far to present impacts by a seiche event. No impacts related to the release of pollutants due to floods, tsunamis, or seiches would occur.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The project site is located within the Coastal Plain of San Diego Groundwater Basin and the regulatory boundaries of the RWQCB. The RWQCB is responsible for the adoption and implementation of water quality control plans, issuance of discharge permits, and performs other functions in relation to regulating the region's water quality. The Water Quality Control Plan for the San Diego Basin (Basin Plan; RWQCB 2021) identifies the project site as within the Chollas hydrologic subarea (HSA) of the San Diego Mesa hydrologic area of the San Diego hydrologic unit (908.22). As identified in item X(a), downstream receiving waters listed as impaired on the Section 303(d) List include Chollas Creek (for copper, diazinon, indicator bacteria, lead, and zinc) and the San Diego Bay (for polychlorinated biphenyls). 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. The proposed project would be required to comply with applicable storm water quality standards during construction and operation. Conformance with the Basin Plan water quality objectives would be demonstrated through compliance with applicable regulations and implementation of construction and post-construction BMPs. Thus, the project would be consistent with the Basin Plan.

In relation to sustainable groundwater management, the project site is located within the larger Coastal Plain of San Diego Basin. The Coastal Plan of San Diego Basin has multiple users, is not adjudicated, and currently does not have an overall groundwater basin management plan. To comply with the Sustainable Groundwater Management Act and the California Statewide Groundwater Elevation Monitoring Program, several local jurisdictions and water agencies formed a cooperative to monitor groundwater. Currently the Coastal Plain of San Diego Basin is not exhibiting signs of overdraft or being at risk of overdraft. Moreover, the project would not directly involve groundwater use. Thus, the project would not conflict with a sustainable groundwater management plan.

Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

XI. Land Use and Planning

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Physically divide an established community?	☐	☐	☐	■
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	■	☐	☐

a) Would the project physically divide an established community?

No Impact. 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 in a developed site already served by existing roadways and utility infrastructure and does not include the construction of public roads, structures, or other improvements that would physically divide or separate neighborhoods. Therefore, the project would not physically divide an established community. No impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant With Mitigation Incorporated. The project site is located within the City Heights area of the Mid-City Communities Plan area and has a land use designation of Industrial. The project proposes to construct a bus maintenance facility, which is consistent with the site's Industrial land use designation. Applicable policies contained in the Mid-City Communities Plan that are intended to avoid or lessen environmental effects are generally within the goals and recommendations of the Natural and Cultural Resources Element. These goals and recommendations and a project consistency analysis of them are provided below in Table 8, *Mid-City Communities Plan Natural and Cultural Resources Element Project Consistency Analysis*.

Table 8
MID-CITY COMMUNITIES PLAN NATURAL AND CULTURAL RESOURCES ELEMENT
PROJECT CONSISTENCY ANALYSIS

Goal/Recommendation	Project Consistency
Geotechnical Conditions Recommendations: Utilize appropriate building techniques and site planning in areas of known geotechnical hazard.	**Consistent**. As discussed in item VII(a), a fault strand could potentially be located within the project site. The Geotechnical Study (Allied Geotechnical Engineers 2022a) 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 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 be required to be constructed in accordance with the CBC guidelines to avoid adverse effects related to fault rupture.
Environmental Quality, Biological Resources Goal: Protect canyon, hillside, and creek-side natural wildlife habitats from urban encroachment and conflicting uses.	**Consistent.** 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. A portion of this open space area is also part of the City of San Diego‘s MHPA. Proposed improvements would occur entirely within the developed site and would not encroach into the adjacent open space area or MHPA beyond. In addition, the project would be required to adhere to the MHPA Land Use Adjacency Guidelines due to the close proximity of the MHPA. Compliance with the Land Use Adjacency Guidelines would avoid indirect effects to open space area.
Environmental Quality, Air Quality Goal: Improve air quality throughout Mid-City through local monitoring, awareness, and the promotion of non-polluting forms of transportation.	**Consistent.** The bus fleet at the proposed facility would consist of entirely of ZEB, which are electric and do not generate emissions of criteria pollutants.
Environmental Quality, Noise Recommendation: Encourage the use of “noise masking” techniques when appropriate.	**Consistent.** The project is located in close proximity to the City of San Diego’s MHPA (as close as approximately 150 feet). Project construction and operations could potentially generate noise in excess of allowable levels at the nearby MHPA boundary to the north that could indirectly affect wildlife. The project would implement mitigation measures NOI-1 and NOI-2 that would include appropriate noise control features that would be incorporated into the project design.

Goal/Recommendation	Project Consistency
Open Space, Landform – Canyons and Creeks Goal: Preserve areas of native vegetation.	**Consistent.** The project site is located in an urbanized area but is also adjacent to an open space area to the north that contains sensitive habitat. Proposed improvements would occur entirely within the developed site and would not encroach into the adjacent open space area.
Open Space, Chollas Creek Goal: Preserve and enhance Chollas Creek as a linear open space system to provide passive recreational opportunities, visual relief, and biological habitat preservation.	**Consistent.** The project site is located adjacent to an open space area to the north that contains sensitive habitat and Chollas Creek. Proposed improvements would occur entirely within the developed site and would not encroach into the adjacent open space area.
Open Space, Parks and Open Space Goal: Protect biological, visual, and topographic resources.	**Consistent.** The project site is located adjacent to an open space area to the north that contains a hillside, sensitive habitat, and Chollas Creek. Proposed improvements would occur entirely within the developed site and would not encroach into the adjacent open space area.
Cultural Resources, Archaeological and Paleontological Resources Recommendation: Identify and preserve significant archaeological prehistoric sites through zoning, development review, or other regulatory means.	**Consistent.** A Cultural Resources Survey was conducted for the project (HELIX 2022b) to identify archaeological and historic resources within the project site. The survey concluded that no historic properties or historical resources would be impacted. While it is unlikely that subsurface archaeological resources are present on the site, Native American habitation sites are known to occur along the Chollas Creek corridor. An archaeological and Native American monitoring program (mitigation measure CUL-1) would be implemented during initial ground-disturbing construction activities that would address archaeological finds.

As discussed in Table 8, the project would be consistent with applicable Mid-City Communities goals and recommendations in the Natural and Cultural Resources Element with implementation of mitigation measures identified in this IS/MND.

The project would also be consistent with the City of San Diego MSCP Subarea Plan (City of San Diego 1997). The project site is located within the Subarea Plan boundary but not within the MHPA. The MHPA is located in close proximity to the site at a distance of approximately 150 feet to the north within the canyon along Chollas Creek. The City of San Diego's MSCP Subarea Plan addresses (among other things) impacts to preserve areas from adjacent development, known as the 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. Due to the adjacency of the MHPA to the site, the project would be required to adhere to the MHPA Land Use Adjacency Guidelines. As discussed in detailed in item IV(a), the project would be consistent with the Land Use Adjacency Guidelines with implementation of mitigation measures (NOI-1 and NOI-2).

Additionally, the project would be consistent with the SANDAG's 2021 Regional Plan (SANDAG 2021) as it would provide new transit infrastructure that would support the goal of bolstering additional transportation mode choices to reduce reliance on the automobile and reducing regional emissions of

criteria pollutants and GHGs. The provision of an all-electric bus fleet would further realize this goal of the 2021 Regional Plan.

Based on the above analysis, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant with mitigation incorporated.

XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZ), according to known or inferred mineral resource potential. As such, the DOC classifies the availability of mineral resources in a region into four MRZ categories: MRZ 1 for no mineral resources, MRZ 2 for significant resources areas with the quality and quantity known, MRZ 3 for significant resource areas with the quality and quantity unknown, and MRZ 4 for areas with no information. According to the Conservation Element in the City of San Diego's General Plan, the DOC is primarily interested in the preservation of significant resources in MRZ 2 regions. The project site is classified as MRZ 3, which is not considered to be significant resource area. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the region. Further, the site is zoned and planned for industrial uses and not extractive uses. Implementation of the proposed project therefore would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As stated above in item XII(a), the City of San Diego's General Plan does not consider the project site to be a significant mineral resource area. Additionally, the project site is not used for mineral extraction and is not known as a locally important mineral resource recovery site. Further, the project site is not delineated on any plan for mineral resource recovery uses. No impact would occur.

XIII. Noise

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	■	☐

The discussion below is based on the Noise Impact Report prepared for the proposed project (HELIX 2022e). This report is included as Appendix I to this IS/MND.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. MTS and SANDAG have not adopted thresholds for use in CEQA documents where they are the Lead Agency or Responsible Agency. In the absence of MTS/SANDAG adopted thresholds, this analysis relies on the City of San Diego's (2020) approved guidelines for determining significance, which are based on Appendix G of the CEQA Guidelines. As such, the project would have a significant noise impact if it would:

- Result in temporary construction noise that exceeds:
    - 75 A-weighted decibel (dBA) time-averaged noise level (L_{EQ}) (12 hour) at the property line of a residentially zoned property from 7:00 a.m. to 7:00 p.m. If construction work is to occur outside of the hours of 7:00 a.m. to 7:00 p.m., the City of San Diego's property line noise limits would be the significance threshold. Therefore, for construction during the evening and nighttime hours, a significant noise impact would occur if the project's construction noise exceeds 45 dBA L_{EQ} (12 hour) from 7:00 p.m. to 10:00 p.m. or 40 dBA L_{EQ} (12 hour) from 10:00 p.m. to 7:00 a.m. at the property line of a single-family residential zone.
    - 60 dBA L_{EQ} or the average ambient noise level, whichever is greater, at the edge of sensitive biological habitat during the breeding season.

- Result in or create a significant permanent increase in the existing noise levels that creates an exceedance of local standards. For the purposes of this analysis, a significant increase would be greater than a perceptible change (3 dBA) over existing conditions that creates an exceedance of City of San Diego standards, the generation of noise levels at a common property line that exceed the applicable limits, or operational noise that exceeds 60 dBA L_{EQ} or the average ambient noise level, whichever is greater, at the edge of sensitive biological habitat.

Temporary Construction Noise

The proposed project would generate temporary increases in noise during its construction. Construction of the project would require demolition, grading, building construction, paving, and architectural coating. 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 in use at any given time. The project site is located as close as approximately 150 feet from the MHPA within the open space area to the north. At times, equipment may be in use over 1,000 feet from the MHPA boundary. For the purposes of this analysis, construction equipment is conservatively assumed to be located approximately 110 feet away from the MHPA, and the nearest residential uses to the project site (on 48th street) are conservatively assumed to be located approximately 350 feet east of the easternmost portion of the project site. Table 9, *Construction Noise Levels by Phase*, shows the anticipated construction noise levels for the proposed project.

Table 9
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		

Phase	Equipment Type	Equipment L_{MAX} at 50 feet	Composite L_{EQ} at 50 feet	Composite L_{EQ} at 110 and 350 feet[1]
Architectural Coating	Air Compressor	80.6	77.6	70.7/60.7

Source: HELIX 2022e

[1] 110 feet is the assumed shortest distance to the MHPA boundary, 350 feet is the approximate distance to the nearest residential land uses

L_{MAX} = maximum noise level; L_{EQ} = time-averaged noise level

At a distance of 350 feet, the loudest noise levels during construction (grading activities) are projected at 68.1 dBA L_{EQ} at residential locations, which would not exceed the City of San Diego's 75 dBA L_{EQ} daytime limit. Construction is not planned to occur during evening and weekend hours. Construction noise generation would have a less than significant impact related to nearby residences.

Due to the likelihood of working in close proximity to one another, it was conservatively assumed that all equipment needed for grading would be in operation simultaneously at 110 feet from the edge of the MHPA during the breeding season with a typical operation for 40 percent of an hour. At a distance of 110 feet, if used simultaneous near the edge of habitat, these pieces of equipment could generate an hourly combined average noise level of 78.1 dBA L_{EQ}. The use of construction equipment during demolition and grading would therefore potentially exceed the allowable 60 dBA (L_{EQ}) and existing ambient noise levels at the edge of the MHPA. Consequently, construction-related noise could result in a potentially significant impact at the edge of the MHPA. Implementation of mitigation measure NOI-1 would reduce impacts to below a level of significance.

NOI-1 MHPA Construction Noise Control Plan. A project construction noise control plan shall be prepared when project construction details are available to provide plans for compliance with the MHPA maximum noise limit of 60 dBA L_{EQ} or the existing ambient noise level. The construction noise control plan shall be approved by SANDAG and MTS and implemented by the construction contractor.

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 likely reduce noise levels to allowable limits at the MHPA boundary 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. To meet industry noise control standards, the noise control barrier would not contain cracks or gaps through or below the installation. Any seams or cracks must be filled, caulked or overlapped.

Impacts from temporary construction noise would be less than significant with mitigation incorporated.

Construction Traffic Noise

Project construction would require haul trucks to bring and remove material to the site. The demolition phase is anticipated to have the highest daily traffic level due to the material being hauled off-site. It is anticipated that 805 truck trips (1,610 one-way trips) would be required to haul 16,100 tons of debris off-site over the course of 20 workdays during the demolition phase of construction. This would equate to approximately 80 one-way haul truck trips, or passes, per day. Over the course of an eight-hour construction day, it is assumed ten haul truck trips would occur per hour.

A general rule of thumb is that a doubling in noise, a three-dBA increase, would be considered a significant increase. Existing traffic levels range from 5,500-16,000 average daily traffic (ADT), which translates to approximately 550-1,600 peak hour trips. Since the proposed project would result in ten additional truck trips per hour during construction, the proposed project would not result in a doubling in noise and would not cause a 3-dBA increase in existing noise levels along these roadways. Therefore, impacts from construction traffic noise would be less than significant.

Operational Noise

This proposed project would involve the maintenance and storage of electric buses and associated office buildings. At slow speeds (10 miles per hour [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. Buses are equipped with backup alerts and kneeling and wheelchair ramp deployment signals, which are very briefly tested on-site prior to buses leaving for routes, and would be audible for a very brief moment when tested for operation. Stationary operational noise from stationary sources would occur at exterior building locations around the proposed 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 10, *Operational Stationary Noise Generation at 50 Feet*.

Table 10
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

Source: HELIX 2022e

The operational sources have the potential to create noise in excess of both the MHPA noise limit of 60 dBA L_{EQ} or existing ambient noise levels and the City of San Diego's industrial exterior noise limit of 75 dBA L_{EQ} (day and night) at the property boundary. Thus, on-site operational noise generated by site operations could result in potentially significant impacts. Implementation of mitigation measure NOI-2 would reduce impacts to a less than significant level.

NOI-2 **Stationary Equipment Noise Control Plan**. A project 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. SANDAG shall approve and implement this plan.

Noise impacts generated by on-site operational noise sources would be less than significant with mitigation incorporated.

Operational Traffic Noise

An opening year of 2026 was analyzed in the TIS prepared for the project (VRPA Technologies 2022). Table 11, *Project Traffic Noise Levels*, summarizes the increases in noise that would occur with the addition of project-related traffic on Federal Boulevard and 47th Street.

Table 11
PROJECT TRAFFIC NOISE LEVELS

Street	Opening Year + Project ADT	Centerline to 70 CNEL/ Peak dBA (feet)	Centerline to 65 CNEL/ Peak dBA (feet)	Centerline to 60 CNEL/ Peak dBA (feet)	Opening Year (No Project) CNEL/Peak dBA 50 feet from Centerline of Outermost Lane (dBA)	Opening Year + Project CNEL/Peak dBA 50 feet from Centerline of Outermost Lane (dBA)	Change (dBA)
Federal Boulevard (West of 47th Street)	6,620	34	100	295 feet	65.8	66.3	0.5
Federal Boulevard (East of 47th Street)	11,470	55	170	450 feet	67.8	68.3	0.5
47th Street (North of Federal Boulevard)	10,250	25	85	260 feet	65.3	65.6	0.3
47th Street (South of Federal Boulevard)	18,180	44	155	425 feet	67.7	68.1	0.4

Source: HELIX 2022e
ADT = average daily traffic; CNEL = Community Noise Equivalent Level; ft = feet

As shown in Table 11, the greatest project-related traffic noise level increase would be 0.5 dBA for the analyzed roadway segments when all project components are operational, which would not exceed the perceptible threshold of 3 dBA. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels. Impacts from operation traffic noise would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. MTS and SANDAG have not adopted thresholds for use in CEQA documents where they are the Lead Agency or Responsible Agency. In the absence of MTS/SANDAG adopted thresholds, this analysis relies on the City of San Diego's (2020) approved guidelines for

determining significance, which are based on Appendix G of the CEQA Guidelines. As such, the project would have a significant vibration impact if it would:

> Subject vibration-sensitive land uses to construction-related ground-borne vibration from continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment) that exceeds the vibration criterion of 0.3 inch per second peak particle velocity (PPV), as specified by the Federal Transit Administration (FTA) for engineered buildings.

Construction of the proposed 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 potential site locations, 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, vibration levels from compaction are considered conservative for the project construction. Operation of a vibratory compactor would create approximately 0.21 inch per second 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. Therefore, although a vibratory roller may be perceptible to nearby human receptors, temporary impacts associated with the roller and other potential equipment used during project construction would be less than significant. The proposed project does not include operational components that would generate substantial vibration. Operational vibration impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. As noted in item IX(e), the project site is within the AIA for SDIA, but with Review Area 2, which lies outside of the 60 dB CNEL noise contour (San Diego Regional Airport Authority 2014). Thus, people at the project site would not be exposed to excessive noise from aircraft operations. Impacts would be less than significant.

XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	■	☐

[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.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	■	☐

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The proposed project does not include housing that would directly induce population growth. The project would provide employment opportunities at the proposed facility, which could provide up to as many as 575 jobs at full buildout of the proposed facility. It is anticipated that most of these jobs would be filled by existing residents in the region. It is possible that some of the project's future employees would relocate to the area, but such numbers would not be substantial so as to adversely affect existing and future housing stock in the community. According to estimates by SANDAG, the Mid-City: City Heights area had a 2.3 percent housing vacancy rate in 2020 and is projected to have a vacancy rate of 3.5 percent in 2035 and 4.1 percent in 2050 (SANDAG 2013). Thus, incremental population growth as a result of project-related employment opportunities could be accommodated by the current and future housing stock. Furthermore, the project would not result in the extension of roads or other infrastructure that would indirectly induce substantial population growth. Therefore, the proposed project would not induce substantial population growth in an area, either directly or indirectly. Impacts would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The project site currently contains nine structures that are used for industrial purposes that would be demolished to accommodate the proposed project. Thus, the proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. Moreover, the project site is not designated or zoned for residential land uses and therefore, project implementation would not remove land assigned for this purpose thereby indirectly resulting in the need for housing elsewhere. The existing on-site businesses (approximately eight) would require relocation, which would displace employees working at the site, but it is anticipated that the relocation of the eight businesses would not displace a substantial number of employees such that replacement housing elsewhere in the region would be required. Impacts would be less than significant.

XV. Public Services

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i.	Fire protection?	☐	☐	■	☐
ii.	Police protection?	☐	☐	■	☐
iii.	Schools?	☐	☐	☐	■
iv.	Parks?	☐	☐	☐	■
v.	Other public facilities?	☐	☐	☐	■

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

Less Than Significant Impact. The project site is located in a developed area currently served by fire protection services, and project implementation would not require the construction of new or expanded fire facilities. The San Diego Fire-Rescue Department (SDFD) provides fire protection services in the project area. Currently the project site supports industrial land uses that like most land uses, may during the lifespan of the uses require a need for fire protection services. The closest fire stations are located approximately 1.25 miles from the project site and include San Diego Fire Station 26 (2859 54th Street) to the northeast and San Diego Fire Station 12 (4964 Imperial Avenue) to the southeast. These stations serve the project area, including the current on-site uses. As with the existing uses, there may be occurrences or events where paramedics or other fire protection personnel would be needed to provide services at the site. The project, however, would not increase population in the project area or cause increased traffic congestion on streets in the project area, or otherwise interfere with the ability of fire services to maintain acceptable service ratios, meet target response times, or other performance objectives for fire protection. During construction, fire protection may be required, but these would be short-term demands and would not require increases in the level of public service offered or affect response times. Impacts would be less than significant.

ii. Police protection?

Less Than Significant Impact. The project site is located in a developed area currently served by police protection services, and project implementation would not require the construction of new or expanded police facilities. The San Diego Police Department provides law enforcement services in the project area, with the closest police station (Southeastern Division) located approximately 3.25 miles to the southeast at 7222 Skyline Drive. The project would not increase population in the project area or cause increased traffic congestion on streets in the project area, or otherwise interfere with the ability of police services to maintain acceptable service ratios, meet target response times, or other performance objectives for police protection. Impacts would be less than significant.

iii. Schools?

No Impact. The project does not propose new housing or other uses that would directly or indirectly induce population growth such that there would be an increase in demand for school services. Therefore, implementation of the proposed project would not result in the need for construction of additional school facilities. No impact would occur.

iv. Parks?

No Impact. The project involves the construction of an industrial use and would not induce growth that would require alteration to existing parks or the construction of a new park. No impact would occur.

v. Other public facilities?

No Impact. The project site is located in a developed area where public services are already provided. The project would not adversely affect existing levels of facilities to the area and would not require the construction of new or expanded governmental facilities. No impacts to other public facilities would occur.

XVI. Recreation

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed project consists of construction and operation of a bus maintenance facility and would not induce growth that would substantially increase the use of existing neighborhood or regional parks or other recreational facilities. The project is not anticipated to result in the use of available parks or facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project consists of construction and operation of a bus division facility that would not require or result in the need to construct or expand recreational facilities. No impact would occur.

XVII. Transportation

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	■
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	■	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	■	☐
d) Result in inadequate emergency access?	☐	☐	■	☐

The discussion below is summarized and based on the analysis and conclusions contained within the Transportation Impact Study (VRPA Technologies 2022) prepared for the proposed project. The report is included as Appendix J to this IS/MND.

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. The proposed project 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 GHGs.

Similarly, the project would be consistent with the goals of the City of San Diego General Plan Mobility Element 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.

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 adversely affect operations of the roadways or intersections in the project area, including Federal Boulevard and 47th Street.

Based on the above analysis, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system. No impact would occur.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. As of the implementation of Senate Bill (SB) 743 on July 1, 2020, VMT is the new performance measure used in CEQA transportation studies. The analysis of VMT for the project was based on procedures included in the Guidelines for Transportation Impact Studies in the San Diego Region (Institute of Traffic Engineers 2019).

This project is considered to be an employment project. For employment projects, the project VMT per employee is compared to the regional average VMT per employee. Projects that have a VMT per employee less than 85 percent of the regional average are presumed to have a less than significant VMT impact. For this purpose, an employment project is considered to be a land use where employees of a business or government agency are located to provide a service or produce goods. This is in comparison to residential projects where the primary purpose is to provide housing and retail projects where the primary purpose is sale of goods to the public. Bus trips are not included in the consideration of VMT impacts since SB 743 applies to auto traffic.

The San Diego SB 743 VMT Maps, an online calculation tool provided by SANDAG, was used to model regional travel demand. The San Diego VMT Maps report a 2016 VMT per employee value of 15.3 for the project area. VMT per employee values for 2016 are used since this is the most recent year for which SANDAG provides a baseline VMT per employee value. The percentage or regional average is determined by dividing the VMT per employee of 15.3 by the regional average VMT per employee of 18.9. The result is that the project has a VMT per employee value that is 80.9 percent of the regional average. Since the project has a VMT per employee value less than 85 percent of the regional average, the project is considered to have a less than significant VMT impact. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The project site does not include any design features that would increase traffic hazards. 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 site. The project proposes to install a new traffic signal at the site's westernmost access driveway along Federal Boulevard to facilitate bus movements to and from the site onto Federal Boulevard. Additionally, during construction, the proposed project would comply with local regulations regarding temporary road closures and/or one-way traffic controls. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. Access to the site would be provided via up to four driveways on Federal Boulevard. The driveways would be of standard size to accommodate buses, passenger cars, and emergency vehicles. One of the driveways (western-most) would include a new traffic signal. Project-related traffic would not cause a significant increase in congestion on local roadways such that it would interfere with emergency response access. The proposed facility also would include internal access drives and parking areas that could accommodate emergency vehicle movements within the project site. Project construction may result in segments of Federal Boulevard temporarily being narrowed for through traffic. However, the project would ensure that access for emergency vehicles would be maintained at all times throughout the duration of the construction period. Therefore, the project would not result in inadequate emergency access. Impacts would be less than significant.

XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	■	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

The discussion below is summarized and based in part on the analysis and conclusions contained within the Cultural Resources Survey Report (HELIX 2022b) prepared for the proposed project. The report is included as Appendix B to this IS/MND.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less Than Significant With Mitigation Incorporated. A Tribal Cultural Resource (TCR) may be considered significant if included in a local or state register of historical resources; determined by the lead agency to be significant pursuant to criteria set forth in PRC §5024.1; is a geographically defined cultural landscape that meets one or more of these criteria; is a historical resource described in PRC §21084.1, a unique archaeological resources described in PRC §21083.2; or is a non-unique archaeological resource if it conforms with the above criteria.

As discussed in item V(b), the project area is known to have Native American habitation sites along the Chollas Creek corridor. The records search identified 19 cultural resources have been recorded within a half-mile of the project APE; however, none of the resources are located within the project site. Furthermore, no cultural resources were identified within the project area during the field investigation of the site.

A Sacred Lands File search for the project APE was conducted that involved contacting the NAHC on April 27, 2021 for a list of Native American contacts for the project area. The NAHC indicated in a response, dated May 13, 2021, that the results of the search were negative but noted that this "does not indicate the absence of cultural resources in any project area."

Furthermore, in accordance with the requirements of AB 52, emails (sent on May 12, 2022) and notification letters regarding the project were sent on May 17, 2022 to Native American Tribes traditionally and culturally affiliated with the project area (based on a list of Tribes that have requested notification of projects under AB 52 from SANDAG) and to Native American contacts listed 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 have 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 is ongoing.

Due to the proximity of the Chollas Creek corridor and known habitation sites along the creek, there is potential to discover previously unknown TCRs at the project site. However, implementation of mitigation measures CUL-1 identified in item V(b) of this IS/MND would reduce potential impacts to TCRs to less than significant levels. Impacts are less than significant with mitigation incorporated.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. Refer to item XVIII(a) above. Impacts would be less than significant with implementation of mitigation measure CUL-1.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	■	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	■	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The proposed project is located in a developed area with existing infrastructure and utilities. The project includes the construction of a bus division facility with maintenance bays, bus washes, and an administration building(s) that would require utility connections. Wastewater generated from the operations building and bus washes would be discharged into the local sewer main and conveyed for treatment. The project's generation of wastewater would be accommodated by the existing capacity of the City of San Diego's wastewater collection system. Sewage transmission and collection facilities would be installed as part of the project to accommodate the project's wastewater and would connect to the existing sewer system within surrounding roadways. Storm water drainage would be accommodated by the provision of on-site drainage and catch basins that would connect to the existing municipal storm drain system. The City of San Diego would also provide potable water service to the project site via connections in surrounding roadways.

Electrical, gas, and telecommunication facilities would be constructed on-site as necessary and would connect to existing lines in surrounding roadways. The project proposes a land use consistent with the surrounding development and would not result in additional impacts to local utilities or service systems. The project would not require new or expanded utility infrastructure systems. Therefore, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The proposed project is located in a developed area with existing water infrastructure. Water service would be provided by the City of San Diego. According to the City of San Diego's 2019 Integrated Water Management Plan, the City currently purchases most of its water from the SDCWA; this is augmented by local surface flows that feed into the City's reservoirs. The SDCWA purchases water from The Metropolitan Water District of Southern California, which imports water from northern California via the State Water Project and from the Colorado River via the Colorado River Aqueduct. The SDCWA also imports Colorado River Water purchased from the Imperial Irrigation District via Metropolitan's Colorado River Aqueduct, and the SDCWA also purchases desalinated water from a plant in Carlsbad.

As required under the Urban Water Management Planning Act and the California Water Code, the City of San Diego prepared the 2020 UWMP (City of San Diego 2021) that examines the reliability of the water supply during normal, dry, and multiple drought years and provides a foundation for water supply planning. The analysis conducted for the UWMP concluded that under all scenarios that the combination of wholesale water and water supplies will be sufficient to meet water demands. Further, to formulate the forecast demands that are used in determining the sufficiency of water supply in future years, the UWMP relies in part on land use development in accordance with general land use plans. The proposed project is consistent with the City's General Plan and the Mid-City Communities Plan land use designation. Furthermore, the project would not require a substantial increase in water supply for operations, and no new water supplies would be needed to serve the project. Connections to local water mains would involve temporary construction impacts that would occur in conjunction with other on-site improvements after demolishing and disconnecting the existing buildings. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The proposed project is located in a developed area with existing wastewater infrastructure. Wastewater service would be provided by the City of San Diego. The majority of wastewater in the City is treated at the Point Loma Wastewater Treatment Plant and discharged via an ocean outfall into the Pacific Ocean. The City of San Diego plans to increase the amount of wastewater treated to tertiary levels for reuse. Based on the scale of the proposed development, it would not generate the need to construct new wastewater collection or treatment facilities or otherwise cause adverse wastewater impacts. Furthermore, connections to local sewer mains would

involve temporary and less than significant construction impacts that would occur in conjunction with other on-site improvements. Therefore, the project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The proposed project is located in a developed area with solid waste collection services provided by the City of San Diego. Construction and demolition activities would generate solid waste that would be disposed of in a local landfill. The construction contractor would be required to dispose of construction waste through appropriate coordination with landfills in accordance with existing laws and regulations governing the types of waste that are allowed to be disposed of in landfills. The proposed project would be required to comply with the City of San Diego's Construction Demolition and Debris Deposit Ordinance (San Diego Municipal Code §66.0601), which requires that at least 65 percent of construction waste be diverted from landfills via reuse and recycling.

Operation of the proposed project would generate solid waste associated with the proposed uses. The project would incorporate required source reduction techniques and recycling measures to divert waste away from area landfills to help meet County and State requirements, including AB 939, which requires cities to divert 50 percent of solid waste to recycling programs and away from landfills. Additionally, the proposed project would be required to comply with applicable regulations related to solid waste such as the California Integrated Waste Management Act and City of San Diego recycling programs.

Local landfills include the City of San Diego's Miramar Landfill, which is expected to reach capacity in 2025, and the privately operated Sycamore Landfill, which is expected to continue accepting solid waste through 2042 or later. Based on the scale of the proposed project, the development would not generate solid waste in excess of the local/regional landfills' capacity. Therefore, the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to item XIX(d) above. By incorporating waste reduction, recycling, and diversion measures, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

XX. Wildfire

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	■	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	■	☐

According to the Safety Element of the City's General Plan, wildfires typically pose minimal threat to people and buildings in urban areas but increasing human encroachment into natural areas increases the likelihood of bodily harm or structural damage. This encroachment occurs in areas called the wildland-urban interface, which is considered an area within the high and very high fire hazard severity zone, as defined by Cal FIRE. The City of San Diego's Wildfire Hazards map shows that the project site is partially located within a Very High Fire Hazard Severity Zone (City of San Diego 2022). Therefore, the proposed project could potentially expose people or structures to wildland fires and the following wildfire issues apply to the project.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As discussed in item IX(f), access to surrounding roadways would be maintained throughout the construction period. Identified emergency evacuation routes in the vicinity, including I-5, SR 52, I-805, and SR 163 would not be affected during construction or operation. Site access would be provided by up to four driveways from Federal Boulevard, and the project would install a new traffic signal at the western-most driveway to facilitate bus ingress/egress. Based on the TIS prepared for the project (VRPA Technologies 2022), the additional buses and automobiles traveling on Federal Boulevard and other nearby streets would not cause severe congestion that would impede emergency response. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. As discussed in item IX(g), the project site is located in a developed area but is adjacent to open space along Chollas Creek. Given the proximity to this open space canyon, portions of the site are located within an area designated as a VHFHSZ by the City of San Diego Fire-Rescue Department (City of San Diego 2022). The project however would not increase the potential for wildfires in the project area, as the site is already entirely developed, and the project would replace existing structures with new ones. The new buildings and other proposed site improvements would be required to comply with applicable wildland fire risk reduction and prevention requirements of the CBC and the California Fire Code. The project therefore would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The project site is located in a developed area that is served by existing utilities and roadways. The project would not require the installation or maintenance of roads, fuel breaks, emergency water sources, power lines, or other utilities. Therefore, the project would not exacerbate fire risk associated with these types of improvements. No impact would occur.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The site is located adjacent to an open space area characterized by a hillside, canyon, and Chollas Creek, However, the project site is developed and entirely paved and this condition would remain upon project implementation. As discussed in items VII(a)(iv) and X(a)(ii), the project is not subject to landslides or flooding and thus, the risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is negligible. Impacts would be less than significant.

XXI. Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?	☐	■	☐	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. With the incorporation of mitigation measures identified in this IS/MND, the proposed project would not have the potential to substantially degrade the quality of the environment, reduce the habitat of a sensitive plant or animal species, or eliminate important examples of California history or prehistory.

As discussed in Section IV, *Biological Resources*, the proposed project could result in potentially significant indirect impacts to sensitive wildlife in the adjacent off-site open space area and nearby MHPA lands. Implementation of mitigation measures NOI-1 and NOI-2 would reduce potentially significant impacts to biological resources to less than significant levels.

As described in Section V, *Cultural Resources*, and Section XVIII, *Tribal Cultural Resources*, there is a potential for unknown subsurface archaeological resources/Tribal Cultural Resources given the presence of known Native American habitation sites along the Chollas Creek corridor. Such resources, if present, could provide material to address important research questions and may contain culturally sensitive material. Therefore, encountering unforeseen archaeological resources and/or Tribal Cultural Resources during ground-disturbing activities may result in potentially significant impacts. With implementation of mitigation measure CUL-1, these impacts would be reduced to less than significant levels.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?

Less Than Significant With Mitigation Incorporated. Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The project is located in a developed area that is largely built out. No other construction projects are anticipated in the immediate area of the project site.

Implementation of the proposed project would not result in individually limited, but cumulatively considerable significant impacts. As discussed under item III(b), the project's long-term emissions of criteria pollutants and precursors would not exceed the SDAPCD daily or annual screening thresholds. Therefore, the project's operational activities would not result in a cumulatively considerable net increase of criteria pollutants that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Similarly, the project would have a less than significant impact in relation to GHG (refer to Section VIII, *Greenhouse Gas Emissions*), which is inherently discussed in terms of cumulative impacts. Impacts related to cultural resources were conservatively determined to be potentially significant if unknown and unanticipated resources are unearthed during grading activities. With implementation of CUL-1, impacts related to cultural resources would be less than significant, and the project would not result in a cumulatively considerable impact to cultural resources. Additionally, project-related VMT impacts were assessed as less than significant and would not result in cumulatively considerable transportation impacts.

Other future projects within the surrounding area would be required to comply with applicable local, state, and federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts. Project cumulative impacts would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant With Mitigation Incorporated. The project would not consist of any uses or activities that would negatively affect any persons in the vicinity. The air quality analysis summarized in III, Air Quality, concluded that the project would have less than significant impacts in relation to toxic air contaminants and other air quality health concerns. The proposed project would cause an increase in ambient noise levels during construction and occasional operational noise. However, impacts would be temporary and in compliance with local ordinances. The increased noise levels would not cause substantial adverse impacts on human beings.

Risks to humans from encountering hazardous materials associated with existing contamination in the soil and/or groundwater and asbestos and/or lead based paint in existing buildings to be demolished during construction would be avoided through compliance with applicable regulations and implementation mitigation measures HAZ-1 through HAZ-3, as identified in Section IX, *Hazards and*

Hazardous Materials. Risks to humans associated with wildfires would be less than significant as proposed buildings and other proposed site improvements would be required to comply with applicable wildland fire risk reduction and prevention requirements of the CBC and the California Fire Code. Additionally, no substantial adverse effects to humans would occur with respect to geological (refer to Section VII, *Geology and Soils*) or hydrologic (refer to Section X, *Hydrology and Water Quality*) hazards. With implementation of identified mitigation measures, impacts resulting in substantial adverse effects on human beings would be reduced to less than significant levels.

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