

Transmitted via email [CTACProject@sdmts.com](mailto:CTACProject@sdmts.com)

August 11, 2022

San Diego Metropolitan Transit System

**Re: No on Clean Transit Advancement Campus Site 7**

Dear Mr. Desmond;

Groundwork San Diego - Chollas Creek Board of Directors would like to convey our many concerns around the potential impacts of the proposed Clean Transit Advancement Campus (site 7) on the surrounding communities and the environment.

Groundwork San Diego is a non-profit based in Encanto, approximately ½ mile from the proposed project site 7. Our mission focuses on empowering our Chollas Creek Watershed community members to create climate safe neighborhoods and protecting our environmental resources. For the last 15 years, we have played an important role in protecting and restoring Chollas Creek and enhancing the surrounding watershed with the development of walking/biking trails and other community features that enhance the quality of life of our residents.

One important project related to MTS' Site 7 is Groundwork's approval to start construction later this year on the \$9.6M Federal Blvd De-channelization and Trail Project. This project begins across Federal Blvd at Berardini Field and goes west to Home Ave. The project includes naturalizing Chollas Creek and creating a tree-lined walk/bike path and climate-ready pocket park for residents to enjoy. Upon completion, this portion of Federal Blvd will have increased residential use in walking and biking which will be negatively impacted by increased bus and automobile traffic.

After reading the Draft Initial Study/Mitigated Negative Declaration and associated appendices, our concerns encompass:

- the increased traffic on Federal Blvd, 47<sup>th</sup> Street, and surrounding areas
- the environmental impacts on Chollas Creek and protected habitat
- the health and safety impacts on the local children and residents due construction and operational activities.

Please see the attached document with a detailed discussion on our concerns.

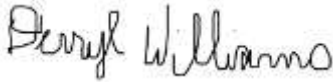
We also have a strong concern that the impacted communities have not been sufficiently informed. Therefore, MTS has not received their input or concerns. Successful engagement can

be measured by numbers of potentially impacted residents contacted, and we would appreciate that results of community attendance at engagement events be published.

As our attached concerns support, Groundwork believes Site 7 has been inappropriately recommended for a mitigated negative declaration under CEQA. An alternative site analysis that would have been conducted as a part of an Environmental Impact Report was not completed. However, the proposed alternative site location at the Gateway Industrial Complex appears to have fewer environmental impacts and thus is less vulnerable to legal challenges under CEQA.

Groundwork champions good environmental management of the Chollas Creek Watershed, climate action, and improving the quality of life for our underserved communities. We applaud the conversion to zero-emission buses and local job creation, but request MTS to reconsider the evaluation process to determine the best possible site for all impacted.

Sincerely,



Derryl Williams  
Board Chair

Board Members

Sara Giobbi    Jon Gohl    Edward Lopez    Jeff Marston    Hugh Mehan    Cheryl Pryatel

Attachment

# Groundwork San Diego – Chollas Creek

## Concerns Submitted August 11, 2022

### *Draft Initial Study/ Mitigated Negative Declaration*

### *MTS Clean Transit Advancement Campus*

Groundwork San Diego – Chollas Creek submits the concerns note below after reviewing the Draft Initial Study/Mitigated Negative Declaration and associated appendices.

#### **Outreach of Project to Community**

1. **Concern:** The communities surrounding the MTS project site were not sufficiently informed about the details of what a new Bus Division would entail in their community for MTS to have received their input or concerns. Successful engagement can be measured by numbers of potentially impacted residents contacted, and we would appreciate that results of community attendance at engagement events be published.

Being present and seeing the minimal community attendance at one of the outreach events, we are concerned the affected communities have not been engaged sufficiently to obtain their concerns.

In reviewing the posted presentations MTS used to inform the public on the project, the information was sparse on the details of the site buildout, operational issues and construction. The community presentations did not reflect the details noted in the November 17, 2021 Memo on Division 6 Project Preferred Site Recommendation and the construction and operational information provided to consultants investigating the site (see Attachments to the Initial Study).

Presentation posted on MTS website: September 13, 2021 - Only one slide had Bus Division details, noting there will be “600 jobs and 250 buses”. Slide 5 states “**We want community input on what we should be considering and what we can do to be the best neighbors possible.**”

Presentation: September 27, 2021, Valencia Park/Malcom X Library – Expect the same presentation was used as September 13, 2021.

MTS Memo on Division 6 Project Preferred Site Recommendation: November 17, 2021. The memo states on page 30 that MTS wants to “ensure” community members participate and are engaged in the project. Site 7 was selected for project and environmental studies, noting the “other sites will remain alternatives for purposes of further evaluation **as might be required.**” June 16, 2022 presentation continued to provide minimal and vague information on what activities will happen at this new Bus Division during construction or operation.

Presentation posted on MTS website: June 16, 2022 – Slide 16 states Site 7 selected for in-depth environmental studies but may not be the final selected site.” **The presentation had very little information on the project details to match those details provided to the consultants for review.** The presentation on slide 22 notes that the fleet transition to zero-emission buses is by 2040. MTS hopes to accelerate this timeline; however, the presentation is silent on the use of the new facility for any of the existing bus fleet that is not zero-emissions. The presentation notes how all the other bus divisions are at capacity, leading to the concern that buses other than zero-emission will be dispatched, repaired and parked at the new facility but are not evaluated in the environmental review.

**Initial Study - Site Use Description**

- 2. Concern on Other Buses at Facility:** Evaluation of the many elements in the Initial Study are based on the assumption that all buses that will be stored, maintained and dispatched from the project site will be zero-emission buses. The reports do not discuss if other buses will be dispatched, stored or repaired at this site.

The Initial Study analysis was done with the assumption that all 250 buses located at the site would be zero-emission buses starting when the facility opens in 2026. However, in Section 2.1 of the Study, it states:

- "...the current division (facilities) are nearing maximum capacity."
- there will be a "transition from natural gas to zero-emission buses over the next 20 years."

MTS has confirmed that only zero-emission buses will be housed, repaired and dispatched from the Federal Blvd facility over the next 20 years. If other buses other than zero-emission buses will be stored, repaired, maintained, and/or dispatched from Federal Blvd location, the present analysis on air pollution, traffic, noise, storm water, and other pertinent areas is not complete.

- 3. Concern on Disclosure of "Activities":** The Initial Study does not provide details of the types of activities to be conducted on-site, so a complete analysis has not been accomplished.

In Section 2.3, the project is characterized as "two to four new buildings would be constructed to accommodate maintenance and service function, administrative space, and potentially some auxiliary uses." The ambiguity of if there will be 2, 3 or 4 buildings constructed along with no description of what an auxiliary use might include causes concern on the site analysis. Traffic, Stormwater, Air Pollution and other evaluated factors that would be affected by these decisions.

In Section 2.3, a description of the Body Shop to be constructed on-site didn't provide any details. Often, a body shop utilizes a paint booth or engages in painting activities when addressing those types of repairs. A paint booth would be expected to have paint emissions and would need to be included in the air pollution evaluation.

- 4. Concern on "Local Hiring" Assumptions:** The Initial Study utilizes the advantages of the hiring of local residents in the analysis, but no details or plans have been provided to validate that assumption.

In Section 2.3, the project staffing noted in footnote 1 state: "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 facility."

The November 17, 2021 Memorandum also notes the intention of hiring employees from the surrounding neighborhood.

Our concern is that this local intention is wrapped up into assumptions within the Initial Study in several areas including traffic impacts. With no tangible plans or descriptions of how the hiring of local residents will be carried out to validate the assumption used in the Initial Study, that may bring into question the use of that assumption in the analysis.

**Air Pollution**

5. **Concern:** The air pollution impacts during construction cannot be evaluated accurately since the Phase II site assessment for hazardous substances on site has not been completed.

In the Allied Geotechnical Engineers, Inc May 24, 2022 study, recommendations on Page 57 note a Phase II site assessment should be conducted to determine the presence of hazardous substances on site. This consultant's recommendation was made due to:

- A burn ash burial site may be on the property (which can contain several hazardous substances).
- Hazardous materials/waste activities have been conducted at this site since the 1950s (hazardous materials and waste management laws/regulations didn't come into existence until the 1980's).
- At least one underground tank was removed in 1986 from 4580 Federal Blvd (investigation and closure requirements were less rigorous at that time).

With Sensitive Area Receptors in the impact area of the project, Webster Elementary School and homes, the evaluation of any impacts and mitigation measures is seems incomplete without knowing existing site conditions.

Without knowledge of the existing hazardous substances site conditions, the conclusion that a mitigation would be effective or an insignificant determination is not based on existing site conditions.

**Traffic Evaluation Concerns**

6. **Concern:** The CEQA Greenhouse gas emissions evaluation of the traffic impacts is based on old data.

Section 2.0, Page 6, of the VRPS Technologies July 11, 2022 traffic study notes that the Census Tract 34.01 Vehicle Miles Traveled (VMT) value was from a 2016 SANDAG study. The study uses 6-year-old data VMT/employee data, thus the calculation for the CEQA transportation impact is not representative of today's activities nor of the future 2026 MTS facility opening.

The SANDAG VMT map's disclaimer states: "Local jurisdictions are under no obligation to use this data in their development approval processes or transportation analyses under SB 743. Users of the data should exercise their professional judgment in reviewing, evaluating, and analyzing VMT reduction estimate results from the tool."

If the 2016 SANDAG **VMT/resident** numbers were taken into consideration for this Census Tract, the VMT/resident jumps to 94.8%, well above the 85% action level. This VMT/Resident gives an indication of the congestion being experienced in this community.

7. **Concern:** The traffic peak PM hour traffic calculations are under counted, causing an error in the MTS project traffic impact evaluation.

Figure 4.3 of the VRPS Technologies July 11, 2022 traffic study does not account for the full 280 employees noted in the report that are on each MTS shift. Only 120 employees are noted to be entering the four driveways at the PM Peak Hour Traffic projection.

8. **Concern:** Traffic study evaluating the traffic flow, density, and existing street configuration is not based on existing conditions or conditions that will be present with the new facility construction across the street on Federal Blvd.

- Bus traffic and “non-revenue generating” site vehicles were not considered when doing the analysis, focus was only on the addition of employee traffic. Traffic from 250 buses being dispatched from the site along with 60 non-revenue generating vehicles (i.e., supervisors, maintenance staff) will have an impact on the flow of traffic in all directions.
- The intention of going to longer bus lengths was also not considered in the impacts to the flow of traffic as buses are dispatched from the site.
- Traffic estimates for vehicle traffic was calculated using 2017 data and applying an unsubstantiated 2% increase per year.
- Assumptions made on traffic flow on Federal Blvd do not match existing conditions: Section 5.0 Future Traffic Conditions in the VRPS Technologies July 11, 2022 traffic study notes: “separate **right turn lanes were assumed to exist** on the northbound, eastbound, and westbound approaches at the Federal Boulevard/47<sup>th</sup> Street intersection. This was done to reflect the width of these approaches which allows right turns to move separately from the through movements during heavy traffic conditions. These approaches are considered to operate with “de facto” right turn lanes in their current condition. **No changes in lane geometry are considered to be needed and there are no plans to restripe** the intersections to change the approach **to include the designated right turn lanes.**”

This assumption that the width of the street allows for free passage of those choosing to turn right is faulty. When going East on Federal Blvd, there is only one traffic lane, with the remainder of the street with being utilized by tractor trailer trucks or other vehicles for parking (as documented in the google maps photos from 2020).

The street has only a few feet to the intersection where the curb is red. The street width in both directions on Federal Blvd doesn’t support the assumption that “right turns can move separately from through movements.”



Federal Blvd westbound has one lane when approaching Site 7, with limited ability for traffic to freely turn right on any of the four proposed driveways.

## **Noise Evaluation Concerns**

**9. General Operations Noise Concern:** The Initial Study lacks an evaluation on the alarm sound that the buses use for backing up or deploying ADA ramps/equipment. An evaluation is needed on the operational noise impact to residents, Webster Elementary, Berardini Field/park and the MHPA. The project site will have over 250 buses operating daily along with others being repaired. The accumulated sound emitting from bus drivers checking their operational status prior to departing the operations site on each shift and during any repair activities is needed.

### **10. Webster Elementary School, a noise-sensitive land use (NSLUs)**

**Construction Noise Concern:** Construction noise impacts were not evaluated for impacts to the Webster Elementary School, a noise-sensitive land use (NSLUs) which is 200 feet from the project site.

As noted in the MHPA noise analysis (page 19 Helix noise study), an hourly average noise level of **78.1 dBA Leq** would be experienced at **110 feet from the property site**. Page 12 of the Helix Environmental noise study notes that City of San Diego Municipal Code limits on Industrial noise **cannot exceed 75db at any time at the edge of the property**.

Evaluation is needed to ensure construction noise does not impact learning at Webster Elementary.

### **11. City of San Diego's Multi-Habitat Planning Area (MHPA) designated area**

We have concerns regarding the impacts during construction and MTS operations to Chollas Creek, the natural environment adjacent to the project site, and the City of San Diego's Multi-Habitat Planning Area (MHPA) designated area.

The MTS Project is directly adjacent, within 110 feet (Pg 12, Helix Environmental Planning Report), of the City of San Diego's MHPA. As noted on page 21 of the Initial Study, the project must comply at a minimum with the Adjacency Guidelines and "minimize indirect impacts from drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading to the sensitive areas."

**11.1 *Drainage Concern for MHPA during construction:*** The mitigation of site drainage during construction to the natural areas of the Chollas Creek does not seem adequate.

During construction, drainage to the canyon adjacent to the MHPA should be curtailed due to the unknown hazardous substances that have a high likelihood of existing onsite. Hazardous materials and waste regulations were not enacted until the 1980's. With industrial activities occurring at the project location for more than 50 years, the presence of a burn ash site at or near the project site, and an underground storage tank was closed in the 1980's when regulations were less stringent, additional measures to eliminate drainage are needed to protect Chollas Creek, the natural areas adjacent to the project site and the MHPA.

**11.2 *Lighting Concern for MHPA during construction:*** No mitigation of security lighting is proposed during the construction phase.

With the noted more than 12 months of construction activities, lighting is expected to be present on-site for security activities. The initial study has mitigation for lighting during operations, but no mitigation measures were discussed during construction to protect the MHPA area.

**11.3 Noise Concern for MHPA:** Operational noise evaluation was conducted using outdated and incomplete traffic data and traffic conditions.

The Helix Environmental Noise study utilized the VRPA Technologies traffic study for the estimates on traffic noise levels. The traffic study seems incomplete due to:

- the traffic study utilized old data and applied an unsubstantiated 2% increase in traffic per year,
- Did not account for the traffic impacts of buses being dispatched from the site
- Did not account for the impacts of the 60 non-revenue vehicles on-site during the day, impacts by “auxiliary activities, training or daycare site,” the increased traffic due to shift changes at the project site, or the traffic expected with the new industrial facility built across the street.

### **Electrical Energy Concerns**

**12. Concern:** The Initial Study, Energy section seems incomplete due to the lack of evaluation of the additional energy to be used in this community by the 250 buses and the proposed project, **3,700,806 kWh** for direct energy use and an additional 305,256 kWh for water/wastewater use (per Table 6, page 20, Initial Study).

The reasoning that there would be no impact is solely focused on an uncited “anticipated future residential growth in the state and region”. A focus on reduce gasoline/diesel use was the main item discussed.

- A detailed evaluation is needed on the solar array noted that will be constructed and how that will offset electrical energy consumption.
- An evaluation/discussion is needed on how this significant electrical draw will not pull this community into a brownout or blackout during critical peak use times.

### **Drainage/Stormwater Concerns**

**13. Concern:** Drainage to Chollas Creek will be increased by the Project and further exacerbate flooding.

Nashland Engineering’s Preliminary Drainage Study May 20, 2022 notes that the project site surface runoff would be increased by about 1 cuft per second due to the majority of the surfaces being impervious. The Engineer’s opinion that the increased runoff will not increase Chollas Creek flooding did not include any information on the existing conditions of the Chollas Creek drainage system to support that conclusion.

The Engineer also stated that the “The site plan provided for this preliminary study is conceptual in nature and the calculations in this study are subject to change.”

### **Biological Resources**

**14. Concern:** The Initial Study, Biological Resources, section f, is missing an evaluation of the project’s impacts to the Chollas Creek Enhancement Program, adopted by the City of San Diego on May 14, 2002 ([Chollas Creek Enhancement BODY \(sandiego.gov\)](http://sandiego.gov)). This plan is an approved local habitat conservation plan.





**October 20, 2022 Meeting of the San Diego Metropolitan Transit System Board of Directors  
Agenda Item No. 30**

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**October 19, 2022 Response to Letter from Groundwork *San Diego Chollas Creek* on Draft Initial Study/Mitigated Negative Declaration for the Clean Transit Advancement Campus Project**

The following is a response to a comment letter (and attachment) submitted by Groundwork *San Diego Chollas Creek* on August 11, 2022, regarding the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Clean Transit Advancement Campus project. On October 19, 2022, after the materials for this Agenda Item No. 30 were timely posted on MTS' website, the commenter re-sent the letter to MTS and asked that it be shared with the Board of Directors. After further investigation, MTS staff learned that the letter had been trapped in MTS' spam filter, and therefore MTS staff had not had an opportunity to review and respond to the letter with the other comments on the Draft MND contained in Appendix K to the Final MND.

CEQA does not require responses to comments on a mitigated negative declaration under Public Resources Code section 21091(d), (f) and State CEQA Guidelines section 15074(b). Nonetheless, MTS staff carefully considered the comments submitted by Groundwork and worked with the environmental consultants for the project to prepare a detailed response to the August 11 letter. The following response addresses any issues within the purview of CEQA. The response notes where a particular comment has already been addressed in the Final MND, Appendix K, and/or elsewhere in the administrative record. The August 11 letter from Groundwork did not raise any new issues necessitating recirculation of the MND or additional environmental review of the project under State CEQA Guidelines section 15073.5.

**Cover Letter**

The cover letter contains introductory information about Groundwork and its ongoing improvement projects in the Chollas Creek watershed. It also summarizes its concerns with regard to the Draft IS/MND prepared for the project, which are provided in an attachment to the cover letter. Additionally, the cover letter contains a comment that is not included in the attachment. This comment states that an Environmental Impact Report (EIR) with alternative site analysis should be prepared for the project.

The conclusions and supporting analysis contained in the Draft IS/MND that the proposed project would not result in significant environmental effects are supported by substantial evidence contained in the record. Project impacts are adequately analyzed and assessed based on established methodologies and identified CEQA significance thresholds. Where potentially significant impacts are identified, feasible mitigation measures are identified that would avoid or reduce impacts to below a level of significance. Therefore, preparation of an EIR for the project is not warranted or required. The purpose of alternatives within the context of CEQA and an EIR, is to reduce or avoid identified significant impacts of a project. EIR alternatives are developed by identifying potentially significant impacts of a project and making revisions to the project design or location to lessen or avoid such impacts (CEQA



Guidelines Section 15126.6). Identification and analysis of project alternatives are only required for an EIR. As such, environmental analysis of project alternatives is not included or required within the IS/MND prepared for the project. The environmental review process of the Draft IS/MND has been conducted in accordance with the requirements of CEQA.

The comment also states that siting the project at Gateway Industrial Complex is anticipated to result in fewer environmental impacts than at the proposed site; however, no facts or other evidence is provided to support this assertion. No further response is required.

### **Attachment**

**Comment 1:** Extensive public outreach has been conducted as part of the site selection and planning process to engage and seek input from the surrounding community regarding the project. A CTAC public engagement strategy was prepared to guide staff on an effective public participation process for the project. In order to assist with public engagement efforts for the planning and site selection activities, MTS and SANDAG partnered with Urban Collaborative, a community-based organization active within the project area. Urban Collaborative has been a key participant in the project, particularly for the public engagement process.

Representatives from Urban Collaborative helped interface and communicate with the community, generally, and helped plan, schedule, and coordinate two public meetings in September 2021. Urban Collaborative representatives have also conducted in-person noticing and outreach to the communities of City Heights and Southeastern San Diego. Community events at which the project was discussed have included the following:

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

Two project-specific meetings were conducted at the Valencia Park/Malcolm X Library at 5148 Market Street and via Zoom on September 13 and 27, 2021, from 5:00 to 7:00 p.m. These meetings were conducted in a hybrid in-person and virtual format, including a PowerPoint presentation of the project overview, followed by a question-and-answer community discussion session. The presentation was made twice at each meeting, at 5:00 and 6:00 p.m., in order to allow those joining after 5:00 p.m. the opportunity to view the full presentation and ask questions. The presentation was also provided in English and Spanish on the project website. A recording of the presentation was also available for viewing on the website.

The Valencia Park/Malcolm X Library was selected due to its central location to the candidate site selection study area; convenient access by MTS services, including the Euclid Avenue Transit Center and bus service along Euclid Avenue and Market Street with stops at the library; and large enough space allotted for the anticipated attendance. The library is accessible for attendees with disabilities. Bilingual staff and interpreters (English and Spanish) were present for virtual and in-person translation; other languages were available if requested.

An additional virtual meeting was conducted via Zoom on June 16, 2022 that included a PowerPoint presentation of the project and updates since the two initial public meetings. The presentation was made twice: at 12:00 p.m. and at 5:00 p.m. The presentation is available on the project website.

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

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

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

- 9/1/21: Urban Collaborative Transportation Outreach Group (Zoom)
- 9/16/21: Eastern Area Communities Planning Committee (Zoom)
- 9/16/21: Webster Community Council (Zoom)
- 9/30/21: MTS Community Advisory Committee (Zoom)
- 11/1/21: City Heights Community Planning Group (Zoom)
- 5/4/22: Joint Town Council (Zoom)
- 5/16/22: Chollas Valley Community Planning Group
- 5/19/22: Webster Community Council

The project has a dedicated webpage (<https://www.sdmts.com/inside-mts/current-projects/clean-transit-advancement-campus-formally-division-6>) that serves as the information hub and contains all the details that support outreach for the project, including fact sheets, presentation materials, etc. A feedback form is available on the project webpage linked above where stakeholders can submit questions or comments regarding the project.

In addition to community presentations, open houses and one-on-one meetings, other ways MTS actively promoted public engagement included:

Project website data:

- Approximately 2,300 pageviews (since launch in August 2021)
- 2:55 – average time a visitor spent on CTAC webpage

CTAC Emails to stakeholders and others:

- June 10 – webinar reminder (18,362 recipients)
- June 15 – webinar reminder (13,262 recipients)
- July 6 – Open House invitation (17,929 recipients)
- July 14 – CTAC Notice of Intent (81 recipients)

CTAC Social Media:

June 13 – Three posts on Twitter – CTAC workshop promotion (27 likes, 4 re-tweets)

Public Feedback:

Thousands of community members and other interested parties received the project information, received invitations to events, and offered feedback to MTS that has helped evaluate site alternatives and shape the actual project. MTS received a variety of questions and feedback through other channels, including voice telephone, electronic mail, website form submissions, and social media. The vast majority of these inquiries and comments also related to the topics above and were responded to in the same method as received.

In sum, MTS engaged in extensive community outreach on the proposed project, well beyond what is required under CEQA for adoption of a mitigated negative declaration.

**Comment 2:** The proposed project would serve an all-electric bus fleet from its inception. This is noted in Section 2.3 of the IS/MND (page 3), and this is factored into the analysis contained in the IS/MND and supporting technical studies.

**Comment 3:** Section 2.3 of the IS/MND (page 3) includes a list of uses and activities within the proposed on-site buildings. These uses and activities are considered in the analysis contained in the IS/MND and supporting technical studies. The approximate building square footage that would be needed to accommodate the project's maintenance and service functions, administrative space, and potential auxiliary uses are described in Section 2.3 (as part of the project description) and are fully considered and analyzed as part of the project footprint in the technical analyses in support of the IS/MND.

**Comment 4:** The assumption that most employees at the CTAC facility would reside in the region and that some would reside in the surrounding neighborhood is reasonable. Technical analysis of vehicle miles traveled and air quality factors in the number of employee traffic trips generated by the project and the average employee trip length. These calculations are based on industry standard methodologies and data from reliable sources.

**Comment 5:** Section IX.b in the IS/MND (pages 40 through 41) discusses hazardous materials/wastes and concludes that no documented unauthorized releases of hazardous materials are known to have occurred at the project site. It also discloses that an unregulated burn ash facility operated within the project area during the 1930s and 1940s, but its precise location is not known. While records suggest that the burn ash site was located north of the project site, it is possible that it may have operated on a portion of the project site. The IS/MND concludes that while it is anticipated that burn ash was removed during grading and development of the existing on-site and surrounding uses, the potential to encounter burn ash during construction activities remains. The IS/MND identifies mitigation measures (HAZ-1 and HAZ-2) that would reduce impacts associated with hazardous substances (including but not limited to heavy metals, hydrocarbons, and burn ash) to below a level of significance upon implementation of them, including soil sampling and analysis prior to construction to determine the presence or absence of hazardous substances. Therefore, hazardous materials issues, if present, would be addressed and remediated prior to construction.

The air quality analysis accounted for sensitive receptors in the project area and focused on those that are closest to the project site, including Webster Elementary School and the residences east of 47<sup>th</sup> Street (IS/MND page 17), which are in the Webster neighborhood. With regard to hazardous emissions, the IS/MND discloses (see Item IX.c on page 41) that Webster Elementary School is located in close proximity to the project site (less than one-quarter mile) and that people at nearby schools could potentially be exposed to emissions of hazardous materials (asbestos and/or lead-based paint) during

demolition of existing buildings on the project site. Mitigation is identified (HAZ-3) that would reduce impacts to below a level of significance to nearby sensitive receptors.

**Comment 6:** As discussed in Section XVII, *Transportation*, of the IS/MND (pages 63 through 65), a project-specific transportation impact study was conducted for the project in accordance with industry standard methodology and concluded that impacts to transportation systems, vehicle miles traveled (VMT), and transportation-related hazards resulting from the project would be less than significant. The 2016 VMT/employee information is the most recent available data for the VMT/employee metric. It would not be appropriate to use the VMT/resident data because the project is an employment project (and not residential).

**Comment 7:** Traffic congestion is not an environmental issue analyzed under CEQA. Senate Bill 743, which went into effect on July 1, 2020, changed the way transportation impacts are evaluated under CEQA. This legislation changed the transportation impact performance metric from level of service, which is a metric based on traffic congestion factors, to VMT, which measures the actual amount of automobile travel a project would create on the roadway network. As discussed in Section XVII, *Transportation*, of the IS/MND (pages 63 through 65), a project-specific transportation impact study was conducted for the project in accordance with industry standard methodology and concluded that impacts to transportation systems, VMT, and transportation-related hazards resulting from the project would be less than significant. Nonetheless, the Transportation Impact Study dated July 11, 2022 and included as Appendix J to the IS/MND analyzes roadway level of service and delay in Chapters 3 and 5 for informational purposes and requirements outside of CEQA. There are no locations where unacceptable level of service is expected at any study area intersection with the assumed signal modification to include an eastbound right turn arrow overlap phase at Federal Boulevard and 47<sup>th</sup> Street. This modification will need to be coordinated with the City of San Diego. Traffic conditions with the project are expected to be adequate and no off-site improvements are expected to be needed other than the traffic signal that is proposed as part of the project and the signal modification at Federal Boulevard and 47<sup>th</sup> Street. The roadway network has been designed for peak traffic conditions and the traffic levels associated with the project can be accommodated without exceeding the capacity of the roadway system. 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.

**Comment 8:** See response to comment 7 above with regard to specifics of the transportation analysis. Regarding the intersection geometry at the Federal Boulevard/47<sup>th</sup> Street intersection, there is red curb at the northbound, eastbound, and westbound approaches that prohibits parking and leaves enough room for vehicles to freely turn right.

**Comment 9:** Bus backup/ramp signals are included in the evaluation of stationary operational noise in Item XIII.a in the IS/MND (pages 53 through 58). The IS/MND discloses that on-site operational noise generated by site operations could result in potentially significant impacts and identifies mitigation (NOI-2) that would reduce impacts to a less than significant level.

**Comment 10:** The construction noise analysis focuses on the nearby Multi-Habitat Planning Area (MHPA) and the closest residential property to the project site, which is along 48<sup>th</sup> Street to the east. The classrooms at Webster Elementary School are located at a similar distance of approximately 350 feet to the northeast. Thus, construction noise levels at the classroom would be similar to those identified at the closest house, which is approximately 68.1 dBA  $L_{eq}$  (as identified in Section XIII.a of the IS/MND [page 55]). Construction noise generation would have a less than significant impact related to classrooms at Webster Elementary School.

**Comment 11:** As described in Section 2.2 of the IS/MND (page 3 and elsewhere throughout the IS/MND), the project site is adjacent to open space with the MHPA located approximately 110 feet to the north and Chollas Creek approximately 300 feet to the north. Project development would occur entirely within the developed project site and no disturbances or improvements would occur within the adjacent open space area, the MHPA, or Chollas Creek as a result of the project. Thus, the project would not directly impact sensitive habitat within the adjacent canyon. Furthermore, as described in Item IV.b of the IS/MND (pages 20 and 24), compliance with the MHPA Land Use Adjacency Guidelines discussed in Item IV.a of the IS/MND (pages 23 through 24) would ensure that inadvertent impacts to sensitive habitats located immediately adjacent to construction work areas are avoided.

**Comment 12:** As discussed in Item VI.a of the IS.MND (page 30), the energy analysis considers energy consumption sources associated with long-term operations of the proposed CTAC facility, including 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 IS/MND also states that the project's electricity use calculation accounts for the on-site solar generation requirement. Refer to Table 5 in the IS/MND (page 30). The conclusion of no significant impact is based on the project's estimated energy use and anticipated energy projections for the state and region.

**Comment 13:** The project-specific Preliminary Drainage Study (included as Appendix G to the IS/MND) considered the existing conditions and calculated the increase in peak runoff volumes over volumes under existing conditions. Refer to Item X.c.ii of the IS/MND (page 47).

**Comment 14:** The referenced Chollas Creek Enhancement Program is a planning document adopted by the City of San Diego that focuses on (among other things) habitat conservation and enhancements within the Chollas Creek drainage system; however, it is not necessarily a "Habitat Conservation Plan" per se with the sole intention of protecting biological resources through the assemblage of a biological preserve. Nonetheless, the project would not directly impact Chollas Creek and measures are identified through compliance with the MHPA Land Use Adjacency Guidelines and mitigation in the IS/MND to reduce indirect impacts to below a level of significance. Refer to response to comment 11.