DRAFT

Initial Study and Mitigated Negative Declaration

SAN DIEGO CLEAN FUELS TERMINAL LLC PROJECT

National City, California

Lead Agency:

City of National City
1243 National City Boulevard
National City, California 91950

Prepared for:

USD Clean Fuels
811 Main Street, Suite 2800
Houston, Texas 77002

Prepared by:

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May 2023

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DRAFT MITIGATED NEGATIVE DECLARATION

Lead Agency:	City of National City
Project Proponent:	USD Clean Fuels
Project Location:	The San Diego Clean Fuels Terminal, LLC Project (Proposed Project) is located in San Diego County in the City of National City (Figure 1). The Project Area is located between the existing buildings along Cleveland Avenue and the existing Burlington Northern Santa Fe (BNSF) Railway tracks and between Civic Center Drive and West 19th Street (Figure 2). The Project Area is approximately 7.5 acres and is primarily unimproved and undeveloped. The site address is 830 West 18th Street.

Project Description:

USD Clean Fuels (USD-CF) proposes to construct a transloading facility on the BNSF Railway railroad right-of-way (ROW) located between the existing buildings along Cleveland Avenue and the existing BNSF Railway tracks and between Civic Center Drive and W. 19th Street in National City, California. The new San Diego Clean Fuels Terminal will add nine rail spurs and four fixed truck loading spots to transload bio-diesel fuel, renewable diesel fuel, ethanol and sustainable aviation fuel directly from rail cars into trucks. Trucks will be loaded with either renewable diesel fuel, a combination of renewable diesel fuel and up to 20-percent bio-diesel fuel, ethanol or sustainable aviation fuel. The fuel will then be delivered via truck to local retailers within a 35-mile radius. Each truck loading spot will consist of a pump skid, controls and above ground piping between the belly of the rail cars and the bottom loading port of the truck. Small amounts of lubricity, conductivity and red dye will be added in-line in the transload process depending on the order. Each spot also provides a concrete pad and drain for containment of potential spills which will be piped to a containment basin on site.

Plastic Express (PEX, a commercial partner of USD-CF), will operate the facility. A total of 12 employees will work at the site. The terminal will operate 24 hours per day, seven days per week. The employees support a schedule of three people per shift on three 8-hour shifts. A trailer will be provided as an office onsite and will incorporate the control center for the equipment, restrooms, and an area for driver check-in and receipt of their bill of lading.

Rail cars will be delivered to the terminal by BNSF Railway and placed on designated receiving tracks. Once rail cars have been delivered by BNSF Railway, the cars will be switched and spotted for transloading by PEX. Once emptied, cars will be switched to designated departure tracks where BNSF Railway will remove cars as needed.

After completing the quality and quantity assurance requirements of product in each rail car, terminal personnel will unload the fuels directly from the rail cars into trucks via short above ground manifold. A percentage of tanker trucks coming to the facility may be 'wet tankers', trucks having recently hauled other fuels without having been cleaned. The rail car and truck unloading area will be equipped with a containment system capable of containing the contents of 110 percent of an entire rail car volume. In addition, an Emergency Response Plan (ERP) will be developed and implemented, to address and/or manage potential spills or emergency events onsite.

Truck traffic will enter the site from 18th Street and exit on W 19th Street and on to their retail client deliveries. A second rail line will be added at the existing grade crossing on Civic Center Drive to facilitate rail car movements.

The Proposed Project consists of the following improvements:

- Build tracks and turnouts/crossovers to facilitate car movement in/out and within the transload facility.
- Install concrete slab pump pads at each transload spot.
- Install truck load slabs sloped to a drain in the center at each transload spot.
- Install pumps and piping to move fuels from rail cars to truck loading spots.
- Provide containment enclosures for additive totes.
- Provide a concrete-lined containment basin and pipe each load slab drain to the basin.
- Provide track pans for containment at the rail transloading cars.
- Provide an office trailer with control center, restrooms and driver check-in area.
- Provide all weather paving for the facility and circulation.
- Provide lighting for the site as needed.

The terminal is expected to receive approximately 115 trucks per day coming in on 18th Street and exiting the facility on W. 19th Street and on to their retail client deliveries. Approximately 70-percent of truck trips will occur between 6:00 p.m. and 6:00 a.m. to avoid peak traffic periods.

Public Review Period: June 2, 2023 to July 3, 2023

Mitigation Measures Incorporated into the Project to Avoid Significant Effects:

Biological Resources

BIO-1: **Rare Plant Salvage.** Rare plant surveys were conducted within suitable habitat on the Proposed Project during the appropriate blooming periods (i.e., between April and October) following sufficient rainfall during the previous wet season for the special-status plant species with potential to occur on or immediately adjacent to the Proposed Project. The survey was conducted by a botanist or qualified biologist in accordance with the U.S. Fish and Wildlife (USFWS) General Rare Plant Survey Guidelines (USFWS 2002); the California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018); and the California Native Plant Society (CNPS) Botanical Survey Guidelines (CNPS 2001).

Project-related impacts to the Nuttall's acmispon are anticipated to be unavoidable, therefore salvage of seed and donation to a refuge, (e.g., Sweetwater Marsh National Wildlife Refuge) is recommended. A qualified biologist shall collect seed from the Nuttall's acmispon during the appropriate time, store under appropriate conditions, and coordinate with the refuge manager in order to apply seed within the refuge boundaries. Seed shall be collected during July 2022 and the subsequent spring (2023), provided that the Project has not reached construction phase and the plant is present.

BIO-2: **Pre-Construction Survey for Nesting Birds and Special-Status Avian Species.** Where feasible, ground-disturbing activities, including vegetation removal, shall be conducted during the non-breeding season (approximately September 1 through January 14) to avoid violations of the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code §§ 3503, 3503.5 and 3513. Several species identified as having potential to nest year-round; therefore, regardless of time of year, a preconstruction survey for nesting birds and special-status avian species shall be conducted by a qualified biologist (experienced in the identification of avian species and conducting nesting bird surveys) if activities with the potential to disrupt nesting birds or special-status avian species are scheduled to occur. The survey shall include the Proposed Project and adjacent areas where Project activities have the potential to cause nest failure. The pre-construction survey shall be conducted no more than three days prior to the start of ground-disturbing activities (including vegetation removal) within the bird breeding season. Site preparation and construction activities may begin if no nesting birds or special-status avian species are observed during the survey. If nesting birds or raptors or special-status avian species are found to be present, avoidance or minimization measures shall be implemented to avoid potential Proposed Project-related impacts to the species. Avoidance and minimization measures shall be developed by the qualified biologist and may include seasonal work restrictions, additional survey and monitoring requirements, or non-disturbance buffers established around active nests until the biologist has determined that the nesting cycle is completed. The width of non-disturbance buffers established around active nests will be determined by the qualified biologist (300 feet is typically recommended for songbirds and 500 feet is typically recommended for raptors). Once nesting is deemed complete by the qualified biologist as determined through periodic nest monitoring, the non-disturbance buffer will be removed by the qualified biologist and Proposed Project work may resume in the area.

BIO-3: **Compliance with Section 4150 of California Fish and Game Code.** To avoid impacts to bat species, a qualified bat biologist should conduct an appropriate combination of sampling, exit counts, and acoustic surveys to determine if bats are using the palm tree resources in the Project Area. If Project-related impacts to bat species are unavoidable, additional measures may need to be implemented to reduce or eliminate impacts to bat species, including maternity roosts, such as tree removal occurring outside of bat breeding season (October through February) or two-step, two-day removal of palm trees under supervision of a qualified bat biologist.

Cultural Resources

CUL-1: **Archaeological Monitoring.** A qualified professional archaeologist, meeting or working under the direction of someone meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric and historic archaeology should be retained to monitor all ground-disturbing activities associated with Project construction, including vegetation removal, clearing, grading, trenching, excavation, or other activities that will disturb original (pre-project) ground. The monitor must have the authority to temporarily pause activity at the location in the event of an unanticipated discovery, so that he or she can direct the procedures in section 6.3.3.

CUL-2: **Native American Monitoring.** A Native American monitor from a tribe that is traditionally and culturally affiliated with the Project Area should be retained to monitor all ground-disturbing activities associated with Project construction, including vegetation removal, clearing, grading, trenching, excavation, or other activities that will disturb original (pre-project) ground. The Native American monitor should have the authority to temporarily pause activity at the location in the event of an unanticipated discovery, so that he or she can coordinate with the Project archaeologist on the identification of a potential cultural resource and the Project archaeologist can direct the procedures in the following section.

CUL-3: **Post-Review Discovery Procedures.** If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for pre-contact and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the City, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Historic Property, as defined in 36 CFR 60.4. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from

disturbance (AB 2641). The archaeologist shall notify the San Diego County Medical Examiner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Medical Examiner determines the remains are Native American and not the result of a crime scene, the Medical Examiner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

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LIST OF ACRONYMS AND ABBREVIATIONS

Term	Description
AB	Assembly Bill
ANSI	American National Standards Institute
APE	Area of Potential Effects
AT&SF	Atchison, Topeka, & Santa Fe
BLM	Bureau of Land Management
BMPs	Best Management Practices
BNSF	Burlington Northern Santa Fe
BOL	bill of lading
BSA	Biological Study Area
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Offices Association
CARB	California Air Resources Board
CACA	Corrective Action Consent Agreement
CAISO	California Independent System Operator
CalGreen	California Green Building Standards Code

Term	Description
CBC	California Building Code
CCA	California Coastal Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geologic Society
CH_4	methane
CHRIS	California Historical Resources Information System
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNPSEI	California Native Plant Society's Electronic Inventory
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Places
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DA	Delineation Area
dB	decibel
dBA	A-weighted decibel
DOC	Department of Conservation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EOC	Emergency Operations Center
ERP	Emergency Response Plan
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	Greenhouse Gas
HMMH	Harris Miller Miller & Hanson Inc.
HRA	Health Risk Assessment
ICF	International Community Foundation
IEC	Infrastructure Engineering Corporation
IM	Medium Industrial
IMW	Interim Measures Workplan
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
ISE	Imminent and Substantial Endangerment
JD	Jurisdictional Determination
JRMP	Jurisdictional Runoff Management Plan
kv	kilovolts
kWh	kilowatt-hours

Term	Description
L_{dn}	Day-Night Average Noise Level
L_{eq}	Equivalent Noise Level
LCP	Local Coastal Program
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	Most Likely Descendent
MND	Mitigated Negative Declaration
MRF	Material Recovery Facilities
MTS	Metropolitan Transit System
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAS	Naval Air Station
NC&O	National City & Otay
ND	Negative Declaration
N_2O	nitrous oxide
NO_x	nitrogen oxides
NO_2	nitrogen dioxide
NOE	Notice of Exemption
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OA	Operational Area
OEHHA	Office of Environment Health Hazard Assessment
OHV	off-highway vehicle
OHWM	ordinary high-water mark
O_3	ozone
PCB	polychlorinated biphenols
PEX	Plastic Express
$PM_{2.5}$	Particulate Matter Less than 2.5 Microns in Diameter
PM_{10}	Particulate Matter Less than 10 Microns in Diameter
PPV	peak particle velocity
PRC	Public Resource Code
PSI	Pacific Steel Incorporated
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
REL	Reference Exposure Level
RHA	Rivers and Harbors Act of 1899
ROG	reactive organic gases
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SD&A	San Diego & Arizona
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric

Term	Description
SDIV	San Diego and Imperial Valley Railway
SDNHM	San Diego Natural History Museum
SEMARNAT	Secretariat of Environmental and Natural Resources
SIP	State Implementation Plan
SMI	South Metro Interceptor
SO_2	sulfur dioxide
SR	State Route
SSC	Species of Special Concern
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNW	Traditional Navigable Waters
USACE	United States Army Corps of Engineers
USD-CF	USD Clean Fuels
USEPA	U.S. Environmental Protection Agency
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compounds

1.0 BACKGROUND

1.1 Summary

Project Title:	San Diego Clean Fuels Terminal LLC Project
Lead Agency Name and Address:	City of National City 1243 National City Boulevard National City, California 91950
Contact Person and Phone Number:	David Welch City of National City Associate Planner (619) 336-4224
Project Location:	The San Diego Clean Fuels Terminal LLC Project is located in San Diego County in the City of National City (Figure 1). The Project Area is located between the existing buildings along Cleveland Avenue and the existing BNSF Railway tracks and between Civic Center Drive and West 19th Street (Figure 2). The Project Area is approximately 7.5 acres and is primarily unimproved and undeveloped. The site address is 830 West 18th Street.
General Plan Designation:	Industrial/Salt Production
Zoning:	Medium Industrial, High Industrial

1.2 Introduction

The City of National City is the Lead Agency for this Initial Study. The Initial Study has been prepared to identify and assess the anticipated environmental impacts of the San Diego Clean Fuels Terminal LLC Project (Proposed Project). This document has been prepared to satisfy the California Environmental Quality Act (CEQA) (Pub. Res. Code [PRC], Section 21000 et seq.) and State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). CEQA requires that all state and local government agencies consider the environmental consequences of Projects over which they have discretionary authority before acting on those Projects. A CEQA Initial Study is generally used to determine which CEQA document is appropriate for a Project (Negative Declaration [ND], Mitigated Negative Declaration [MND], or Environmental Impact Report [EIR]).

1.3 Surrounding Land Uses/Environmental Setting

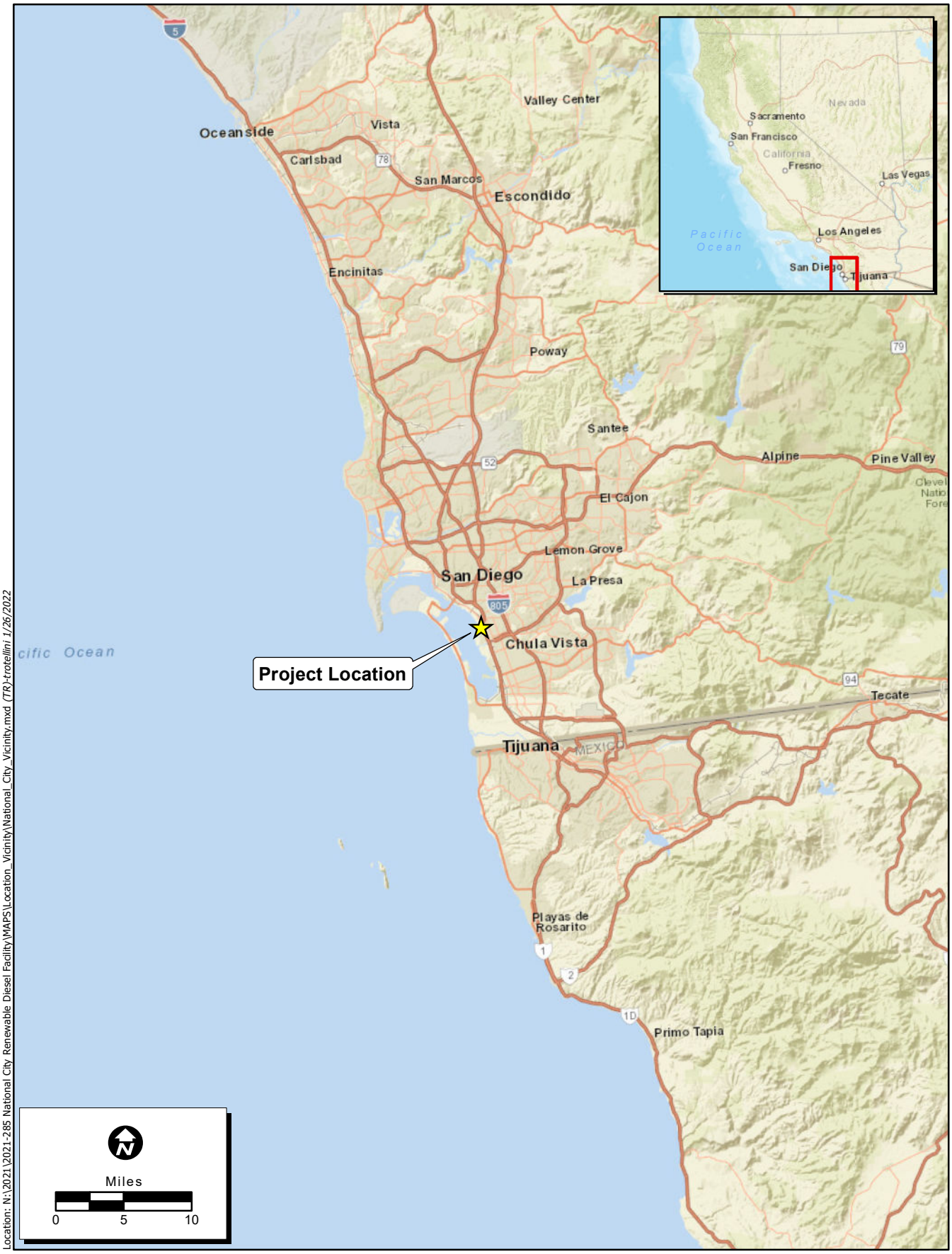
The San Diego Clean Fuels Terminal LLC Project is located in San Diego County in the City of National City (Figure 1). The Project Area is located between the existing buildings along Cleveland Avenue and the existing Burlington Northern Santa Fe (BNSF) Railway tracks and between Civic Center Drive and West 19th Street (Figure 2).

The Project is located within the Medium Industrial (IM)and High Industrial Zone and has a land use designation of Industrial/Salt Production. The Project is surrounded to the north, east, and south by Industrial/Salt Production land use designations and by Marine Related Industrial to the west, as described in Table 1-1.

Table 1-1. Surrounding Land Uses

	Land Use Designation	Zoning Designation	Existing Land Use
Project Area	Industrial/Salt Production	IM – Medium Industrial	Vacant Lot, Pacific Steel
North	Industrial/Salt Production	IH – High Industrial	Warehouses
East	Military	IM – Medium Industrial	Naval Base San Diego
South	Industrial/Salt Production	M – Military	Industrial Businesses
West	Industrial/Salt Production	IM – Medium Industrial	Industrial Businesses

Source: City of National City 2019a; Port of San Diego 2020



Location: N:\2021\2021-285 National City Renewable Diesel Facility\MAPS\Location_Vicinity\National_City_Vicinity.mxd (TR)-trotellini 1/26/2022

Map Date: 1/26/2022

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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Figure 1. Project Vicinity

2021-285 San Diego Clean Fuels LLC Renewable Diesel Facility



Location: N:\2021\2021-285 National City Renewable Diesel Facility\MAPS\Location_ Vicinity\National_City_Location.mxd (TR)-trotellini 5/5/2022

Map Date: 5/5/2022

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community Photo Source: NAIP

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Figure 2. Project Location

2021-285 San Diego Clean Fuels LLC Renewable Diesel Facility

2.0 PROJECT DESCRIPTION

2.1 Project Background

With mounting political and public pressure to reduce reliance on fossil fuels, reduce and re-use waste streams, and cut greenhouse gas emissions, the use of biofuels is becoming a popular fuel alternative which fully complies with California's Low-Carbon Fuels Standard. The category of biofuels includes both Renewable Diesel and Biodiesel. Renewable Diesel can be produced with new or recycled vegetable oils, animal fats, greases, algae, as well as crop residues or woody biomass. Renewable Diesel is also designated as a "drop-in" biofuel allowing it to fully replace petroleum-based diesel with zero modification to storage facilities or engines. Biodiesel is a renewable, biodegradable fuel manufactured domestically from vegetable oils, animal fats, or recycled restaurant grease. Biodiesel is often used as a blend with Renewable Diesel. When used in diesel engines, renewable diesel can reduce greenhouse gas emissions by up to 80 percent. Renewable diesel and a blend of renewable diesel and up to 20 percent biodiesel can also be used to replace petroleum diesel with no changes or adverse effects to the engine. Furthermore, with the ability to utilize a wide variety of resources to produce renewable diesel and biodiesel, these biofuels are considered 100-percent sustainable. All of this makes these fuels environmentally, socially, and long-term economically preferable to petroleum-based fuels.

2.1.1 Site History

Pacific Steel Incorporated (PSI), BNSF's current lessee, currently operates a metal recycling facility at a facility located adjacent and east of the Project Area. PSI has leased this property and the eastern adjacent property (APN 559-040-52) from BNSF since 1981. This property was used by PSI as an auto shredder waste storage area from 1981 to about 1992. The Regional Water Quality Control Board (RWQCB) issued a Cleanup and Abatement Order to PSI in 1987 in response to discharges of contaminant water into the storm drain system, leading to the installation of four groundwater monitoring wells. After auto shredding operations ceased in 1992, the waste pile was removed and disposed offsite and the soil beneath the pile was excavated and stored in stockpiles onsite. A portion of the stockpiles remained onsite until 2002 (Group Delta 2021).

In 2002, the Department of Toxic Substances Control (DTSC) issued PSI an Imminent and Substantial Endangerment (ISE) Order after finding heavy metals such as lead, zinc, copper, polychlorinated biphenyls (PCBs), and used oils in the soil (DTSC 2002). The ISE Order required immediate corrective action and submittal of a workplan to investigate the contamination releases. The RWQCB then transferred the regulatory lead for the investigation and remediation to DTSC, stating that it would consider rescinding the Order if DTSC became lead agency.

Following a Baseline Assessment Report prepared in 2004, PSI entered into a Corrective Action Consent Agreement (CACA) with DTSC for the aforementioned parcels. The CACA directed several phases of work to be completed on the property, including removal of large stockpiles of soil mixed with metal debris and remedial soil excavation. As of 2019, a portion of these activities had been completed, most notably the large stockpiles.

In 2010, SCS Engineers prepared a Stockpile Sampling Report which based on lead concentrations, identified soil stockpile PSI-1 as Resource Conservation and Recovery Act (RCRA) hazardous waste for disposal purposes. Other stockpiles were considered non-RCRA hazardous waste.

By 2014, PSI successfully transported and recycled approximately 27,000 tons of non-RCRA excavated soil from the property to its steel mill located in Mexicali, Mexico. The remaining work to complete remediation was to prepare and implement a workplan to identify additional areas of excavation and to transport the last remaining soil pile (approximately 8,000 cubic yards) from the property (Group Delta 2021). PSI was unable to secure authorization from Mexico's Secretariat of Environmental and Natural Resources (SEMARNAT) to transport the remaining RCRA hazardous waste (PS-1) to Mexico and as a result, shipped the aforementioned waste to a Class I landfill in Buttonwillow, California in 2015 (*People v. Pacific Steel, Inc.* 2015).

On January 11, 2016, DTSC and PSI entered into a Stipulation for Entry of Final Judgement and Order for the adjoining PSI properties. The Stipulation and Final Judgement ordered PSI to conduct soil sampling for heavy metals around the perimeter of the location where the RCRA Hazardous Waste soil pile was located and to remove any residual contaminated soil in a manner consistent with their 2015 Draft Stockpile Removal Workplan (Group Delta 2021).

The Interim Measures Workplan – BNSF Railway Property (IMW) was approved by DTSC in 2021 for the remediation site pursuant to the CACA executed in 2004 between DTSC and PSI. The proposed cleanup goals of the IMW are to remove metals and PCB impacted soils previously identified in the BNSF facility to eliminate the risk to human health and the environment posed by impacted surface soils. The extent of soil removal will be contingent on the results of confirmation samples. Soils will be removed until the detection of metals and PCBs are below the proposed cleanup levels and commercial risk screening level, respectively. The implementation of IMW will conclude the cleanup efforts on the BNSF property. The cleanup measures to be conducted will reduce or eliminate the potential risks to the environment and surrounding neighborhood posed by the impacted soils at the BNSF property.

On May 31, 2022 DTSC filed a Notice of Exemption (NOE) to comply with the CEQA as part of the approval process for the IMW. DTSC determined that the IMW is exempt from CEQA under CCR Title 14, Section 15330 *Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance*. Remediation of the BNSF property under the IMW consists of the removal of metals- and PCB-impacted soils resulting from past metals recycling operations by PSI at the northwestern portion of the site, which is leased from BNSF. Approximately 8,000 cubic yards of contaminated soil will be excavated and disposed of offsite at a permitted landfill (i.e., Copper Mountain Landfill, Arizona). Clean fill will be imported to return the Site to level grade. After completion of soil excavation and disposal activities, a land use covenant restricting future land uses to commercial/industrial uses will be recorded with the County Recorder's Office. Excavation activities will require approximately 600 truckloads (between seven and eight trucks per day) over an approximate 3-month time period to export the contaminated soils to a landfill. To return the Site to level grade, approximately 20,370 cubic yards of fill will be required which will require approximately 2,037 truckloads (between 22 and 23 trucks per day) over the same 3-month time period. Even though implementation of the project will require a large number of truck trips, the trucks will travel exclusively through an industrial

area for a short distance (0.5-mile) to reach Interstate 5 (I-5), which is the major throughway for the Project Area.

To control soil erosion, areas of cleanup activities will be wetted down on an as-needed basis. In addition, a 25-foot-tall dust screen covers the entire eastern side of the property fronting Cleveland Avenue, which is downwind based on prevailing winds in the area. The screen is made of a fine wet mesh designed to collect fine particles and was originally State of California – California Environmental Protection Agency Department of Toxic Substances Control 2 installed during the period when the facility was still conducting auto shredding. The dust screen will reduce or eliminate windblown dust from leaving the Site. Soil excavation and stockpile management activities will also be required to be conducted in accordance with the County of San Diego Air Pollution Control District Fugitive Dust Control, which restricts the discharge of visible dust emissions.

Figure 2 shows the portion of the Project Area that will undergo site remediation.

2.2 Project Objectives

USD Clean Fuels proposes to construct a transloading facility on the BNSF Railway railroad ROW. The Project Area is approximately 7.5 acres and is primarily unimproved and undeveloped. The area was formerly used for railroad and industrial purposes. A portion of the Project Area contains four closed release cases, and one open release case is located on the adjoining/adjacent properties. The open remediation case is the PSI property located adjacent and east of the Project Area at 1700 Cleveland Avenue. Site remediation will be completed by DTSC for the PSI property prior to site development for this Project.

The new terminal will add nine rail spurs and four fixed truck loading spots to transload bio-diesel fuel, renewable diesel fuel, ethanol, and sustainable aviation fuel directly from rail cars into trucks. Rail cars will be delivered to the terminal by BNSF Railway and placed on designated receiving tracks. Once rail cars have been delivered by BNSF Railway, they would be switched and spotted for transloading by Plastic Express (PEX), a commercial partner of USD-CF, which will operate the facility. Once emptied, cars would be switched to designated departure tracks where BNSF Railway would remove cars as needed.

After completing the quality and quantity assurance requirements of product in each rail car, terminal personnel would unload the diesel fuels directly from the rail cars into trucks via short above-ground manifold. The trucks will be loaded with either renewable diesel fuel, a combination of renewable diesel fuel and up to 20-percent bio-diesel fuel, ethanol or sustainable aviation fuel. The rail car and truck unloading area will be equipped with a containment system capable of containing the contents of 110 percent of an entire rail car volume. The fuel will then be delivered via truck to local retailers within a 35-mile radius.

Truck traffic will enter the site from West 19th Street and exit on 18th Street and on to their retail client deliveries. A second rail line will be added at the existing grade crossing on Civic Center Drive. See Figures 3 through 6 for the various civil site plans.

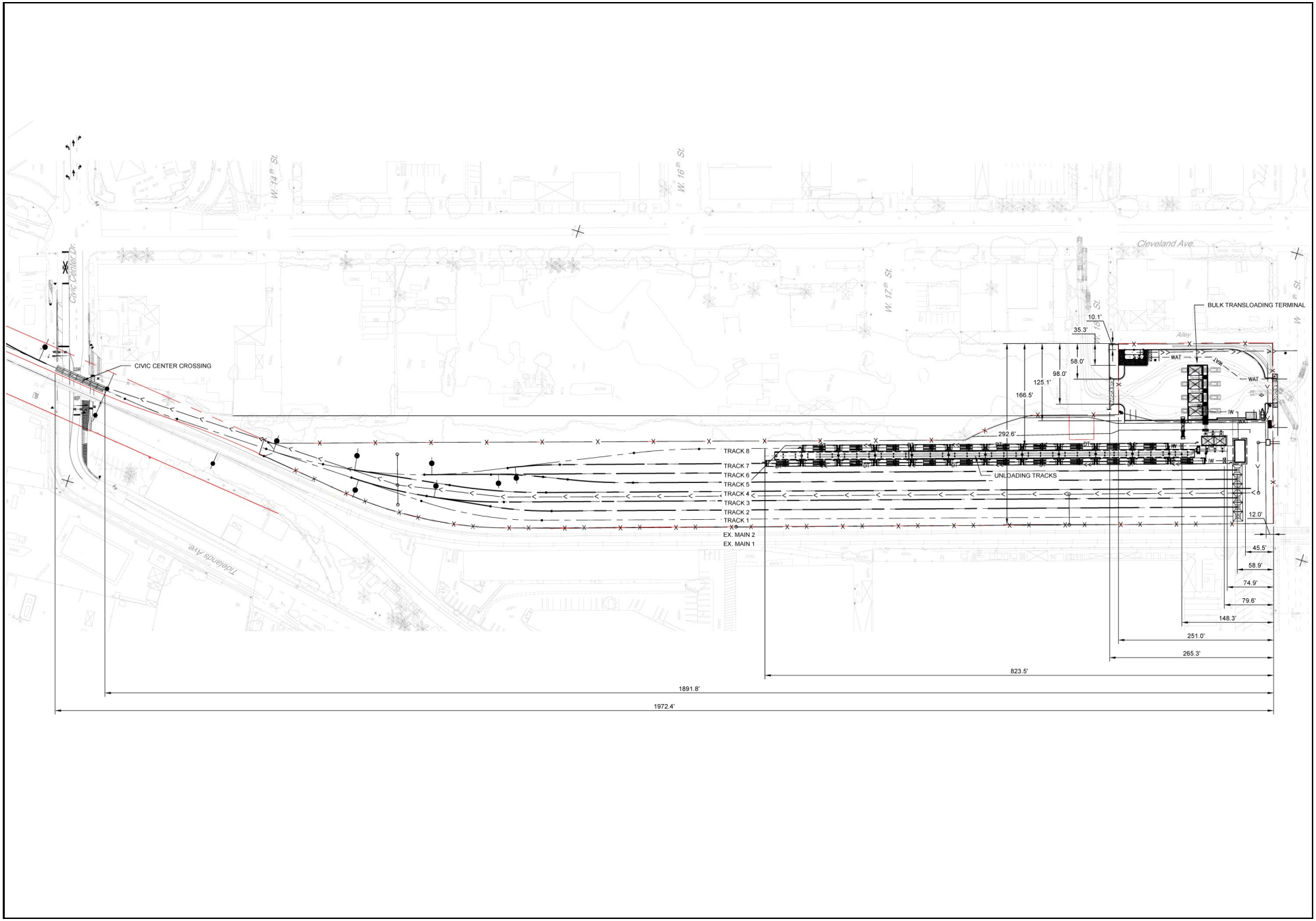
2.3 Project Characteristics

The Proposed Project consists of the following improvements:

1. Build tracks and turnouts / crossovers to facilitate car movement in/out and within the transload facility.
2. Install concrete slab pump pads at each transload spot.
3. Install truck load slabs sloped to a drain in the center at each transload spot.
4. Install pumps and piping to move fuels from rail cars to truck loading spots.
5. Provide containment enclosures for additive totes.
6. Provide a concrete lined containment basin and pipe each load slab drain to the basin.
7. Provide track pans for containment at the rail transloading cars.
8. Provide an office trailer with control center, restrooms, and driver check-in area.
9. Provide all weather paving for the facility and circulation.
10. Provide lighting for the site as needed.

2.4 Project Timing

It is anticipated that construction would occur in the 2023-2024 fiscal year.



ECORP Consulting, Inc.
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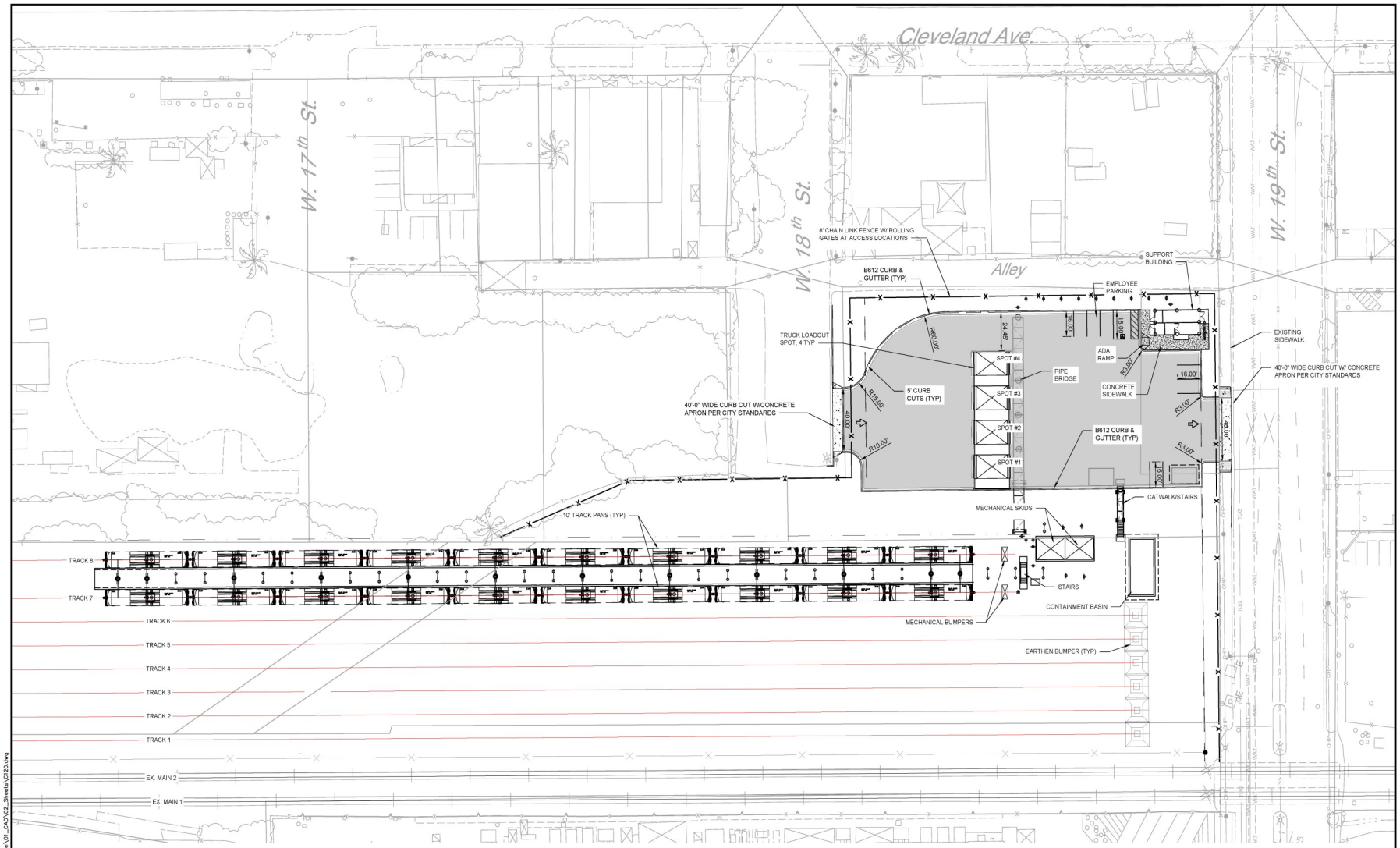
Figure 3. Site Plan
2021-285 National City Renewable Diesel Facility

Source: TKDA



NO.	DATE	BY	DESCRIPTION OF REVISIONS
C	10-21-22	SMI	60% RESUBMITTAL
B	06-17-22	SMI	60% SUBMITTAL
A	04-08-22	SMI	20% SUBMITTAL REVIEW

TKDA

DESIGNED	DRAWN	CHECKED
WBS	WBS	SMI

BAR IS ONE INCH ON FULL SIZE AND ONE-HALF INCH ON HALF SIZE SHEETS. IF NOT, ADJUST SCALES ACCORDINGLY.

KINLEY CONSTRUCTION | Plastic Express | USD CLEAN FUELS

NATIONAL CITY, CALIFORNIA
SAN DIEGO CLEAN FUELS TERMINAL, LLC
CIVIL SITE PLAN

PROJECT. NO. 18383.000
DRAWING NO. C120

CURRENT: Nov 11, 2022 – 8:32am
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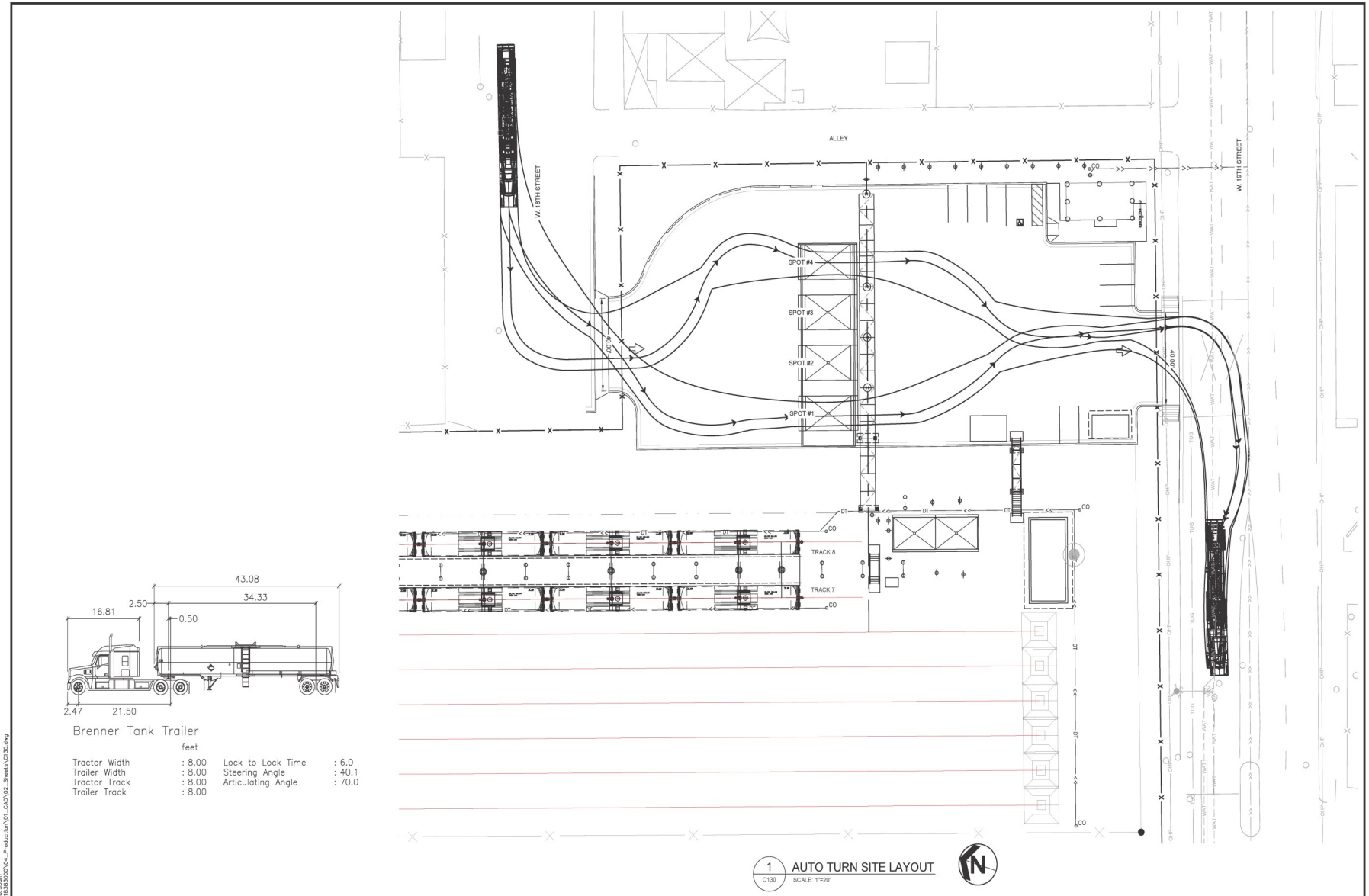
Figure 4. Existing Concept
2021-285 National City Renewable Diesel Facility



NO.	DATE	BY	DESCRIPTION OF REVISIONS
C	10-21-22	SMI	60% RESUBMITTAL
B	06-17-22	SMI	60% SUBMITTAL
A	04-08-22	SMI	20% SUBMITTAL REVIEW

TKDA

DESIGNED	DRAWN	CHECKED
WBS	WBS	SMI

BAR IS ONE INCH ON FULL SIZE AND ONE-HALF INCH ON HALF SIZE SHEETS. IF NOT, ADJUST SCALES ACCORDINGLY.

KINLEY CONSTRUCTION | Plastic Express | USD CLEAN FUELS

NATIONAL CITY, CALIFORNIA
SAN DIEGO CLEAN FUELS TERMINAL, LLC
AUTO TURN SITE LAYOUT

PROJECT. NO. 18383.000
DRAWING NO. C130

CURRENT: Nov 11, 2022 – 8:33am
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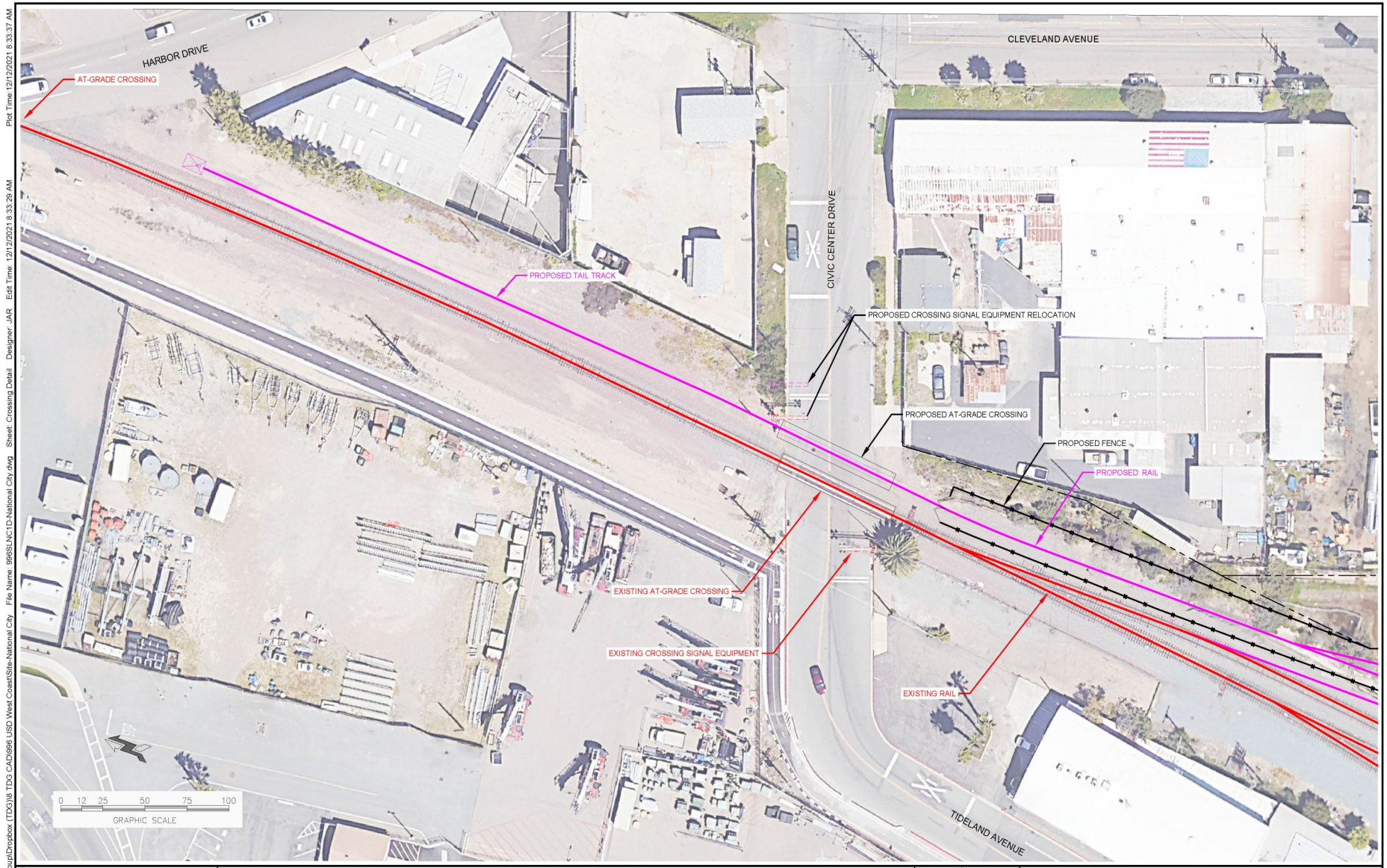
Figure 5. Transfer Area Detail
2021-285 National City Renewable Diesel Facility



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NO.	DATE	NOTES
1	12 DEC 21	ORIGINAL

USD CLEAN FUELS

TRANSDEVELOPMENT GROUP

PROJECT	996
FILE	996SLNC1D
CTB	tdg-lw.ctb
DESIGNER	JAR
EDIT DATE	12/12/2021
SAVE TIME	8:33:29 AM
PLOT DATE	12/12/2021
PLOT TIME	8:33:37 AM

TAIL TRACK AT-GRADE CROSSING
USD FACILITY
NATIONAL CITY, CALIFORNIA

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Figure 6. Crossing Detail
2021-285 National City Renewable Diesel Facility

2.5 Regulatory Requirements, Permits, and Approvals

The following approvals and regulatory permits would be required for implementation of the Proposed Project:

- San Diego Regional Water Quality Control Board (RWQCB) National Pollutant Discharge Elimination System (NPDES) Permit
- San Diego Air Pollution Control District Permit to Operate

2.6 Consultation With California Native American Tribe(s)

The following California Native American tribes traditionally and culturally affiliated with the Project Area have been notified of the Project:

- Barona Group of Capitan Grande
- Sycuan Band of the Kumeyaay Nation
- La Posta Band of Diegueno Mission Indians
- Viejas Band of Kumeyaay Indians
- Manzanita Band of Kumeyaay Nation
- Campo Band of Mission Indians
- San Pasqual Band of Mission Indians
- Jamul Indian Village
- Mesa Grande Band of Mission Indians
- Ewiiapaayp Band of Kumeyaay Indians
- Kwaaymii Laguna Band of Mission Indians
- Ipay Nation of Santa Ysabel
- Inaja Band of Mission Indians

The City received one response from the Mesa Grande Band of Mission Indians on March 24, 2023 to notify the City that the current chairperson of the tribe is Theresa Hernandez. No tribes have requested consultation pursuant to PRC section 21080.3.1. A summary of the notification process is provided in Section 4.18 of this Initial Study.

3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

3.1 Environmental Factors Potentially Affected

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

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

Determination

On the basis of this initial evaluation:

I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	☐
I find that although the 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 Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	☐
I find that the 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 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 Project, nothing further is required.	☐



May 30, 2023

Martin Reeder, AICP
Planning Manager

Date

3.2 Evaluation of Environmental Impacts

3.2.1 Evaluation Process

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources 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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "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.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question.

   b) The mitigation measure identified, if any, to reduce the impact to less than significant.

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4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION

4.1 Aesthetics

4.1.1 Environmental Setting

The City of National City is a small city comprised of a number of neighborhoods and districts. The visual character is typical of surrounding cities and contains several aesthetic resources such as scenic vistas of San Diego Bay and mountains to the east, cohesive residential neighborhoods, and a vibrant, pedestrian-scale downtown (City of National City 2011a).

4.1.1.1 Regional Setting

State Scenic Highways

The California Scenic Highway Program protects and enhances the scenic beauty of California's highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view. According to the California Department of Transportation (Caltrans), there are no state-designated scenic highways in the City (Caltrans 2019).

4.1.1.2 Visual Character of the Project Area

The Project Area is largely open ground with railroad tracks, railroad materials, and trash. There is an unconnected utility pole and an abandoned utility structure on the southern end of the Project Area. Four utility poles with active power lines are located in the Project Area. A paved parking lot is located in the southeast portion of the Project Area. Adjoining properties to the north consist of industrial structures, to the south by a vacant former rail yard, to the east by PSI (metals recycling and storage), and to the west by a commercial retail center and large warehouse. The character of the Project Area is industrial.

4.1.2 Aesthetics (I) Environmental Checklist and Discussion

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

No Impact.

The Proposed Project involves constructing a transloading facility on the BNSF Railway railroad ROW property. San Diego Bay is located to the west and mountains are located to the east of the Project Area, however, any potential scenic views in the Project Area are obstructed by surrounding industrial development.

The Project Area's current visual character and quality of the site is degraded as the vacant lot is littered with debris, contains no structures, and contains minimal vegetation. The City's General Plan includes goals and policies for the protection of scenic resources and significant viewsheds (City of National City 2011a). The City considers natural areas such as San Diego Bay, open space, creeks, natural hillsides, and historic structures as scenic resources. None of these of these resources exist in the Project Area with the exception of San Diego Bay; however, views of San Diego Bay from the Project Area are already obstructed by intervening structures. No scenic vistas are located within the Project Site of vicinity. Project implementation would not result in a substantial adverse effect on a scenic vista. No impact would occur, and no mitigation is required.

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

No Impact.

According to the City's Comprehensive Land Use Update Draft EIR and Caltrans, there are no officially designated state scenic highways in the City (City of National City 2011a; Caltrans 2019). Therefore, no damage would occur to scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. No impact would occur, and no mitigation is required.

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less Than Significant Impact.

The Proposed Project is located in an urban developed area characterized by industrial land uses. Project implementation would be consistent with the underlying land use and zoning designations and would convert an unimproved railroad RJOW into a transloading facility. Furthermore, site cleanup of the remediation portion of the Project Area under DTSC's purview would result in the removal of contaminated materials and soils and allow for site development.

Short-term construction activities could potentially temporarily degrade the existing visual character and quality of the surroundings. During the construction phase, various equipment, vehicles, building

materials, stockpiles, disposal receptacles, and related activities would be visible in the Project Area. However, construction-related activities would be short-term and temporary in nature. Once completed, all general construction activities would cease, along with any construction-related aesthetic impacts.

Implementation of the Proposed Project would not degrade the existing visual character or quality of the site and its surroundings and would convert existing underutilized property into a developed use. Site development would comply with the City's landscape requirements and would add trees and vegetation along the perimeter. Because there are no designated scenic views current visible from the Project Area, the Proposed Project would not conflict with existing zoning in the area or scenic quality regulations. A less than significant impact would occur, and no mitigation is required.

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Less than Significant Impact.

The Proposed Project would provide lighting for the Project Area during operation as needed. This light source would not adversely affect day or nighttime views in the area, as views are already obstructed by surrounding industrial developments. Light fixtures to be installed as part of the Project is required to adhere to lighting standards established by the City's Municipal Code. Impacts would be less than significant, and no mitigation is required.

4.1.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

"Forest land" as defined by PRC Section 12220(g) is "…land that can support 10-percent native tree 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."

"Timberland" as defined by Public Resources Code Section 4526 means "…land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis."

"Timberland zoned Timberland Production" is defined by PRC Section 51104(g) as "..an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision h."

The City of National City is almost completely developed and does not have any designated Prime or Unique Agricultural Land. The City must rely on urban agriculture to increase local food production since there are no large remaining open spaces for agricultural uses. Several examples of urban agriculture exist within the planning area, including the Stein Family Farm, the International Community Foundation (ICF) Center Garden, and the ICF Olivewood Garden (City of National City 2011b). According to the California Department of Conservation (DOC) Important Farmland Finder, the Project Area is classified as Urban and Built-Up Land. The Project Area is not located on or near Prime Farmland, nor is it under a Williamson Act Contract (DOC 2022).

4.2.2 Agriculture and Forestry Resources (II) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

According to the California Important Farmland Finder, the Project Area is located on land classified as Urban and Built-Up Land. Therefore, the Proposed Project would not be located on land classified as prime farmland, unique farmland, or farmland of statewide importance (DOC 2022). No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

No Impact.

The Project Area is not located on land zoned for agricultural use. According to the California Important Farmland Finder, the Project Area is mapped as Urban and Built-Up Land and not an agricultural preserve subject to a Williamson Act contract (DOC 2022). The Proposed Project would not conflict with zoning for agricultural use or a Williamson Act Contract. No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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))?	☐	☐	☐	☒

No Impact.

The Project Area is located on land currently designated for industrial/salt production uses and is surrounded by primarily industrial uses. The Project Area is not located on land designated for forest land, timberland, or timberland zoned timberland production. No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

No Impact.

The Project Area is not zoned for forest land, timberland, or timberland production (DOC 2022). Therefore, 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, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project Area and surrounding properties are not currently designated for agriculture. The Project Area and areas to the north, east, south, and west are located on land designated as Urban and Built-Up Land (DOC 2022). Development in the Project Area would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

4.2.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.3 Air Quality

4.3.1 Environmental Setting

Air quality in a region is determined by its topography, meteorology, and existing air pollutant sources. These factors are discussed below, along with the current regulatory structure that applies to the San Diego Air Basin (SDAB), which encompasses the Project Area, pursuant to the regulatory authority of the San Diego Air Pollution Control District (SDAPCD).

Ambient air quality is commonly characterized by climate conditions, the meteorological influences on air quality, and the quantity and type of pollutants released. The air basin is subject to a combination of topographical and climatic factors that reduce the potential for high levels of regional and local air pollutants. The following section describes the pertinent characteristics of the air basin and provides an overview of the physical conditions affecting pollutant dispersion in the Project Area.

4.3.1.1 San Diego Air Basin

The Project Area is in National City in San Diego County (County). This region is within the SDAB. The topography in the SDAB varies greatly, from beaches on the west to mountains and desert on the east. Much of the topography in between consists of mesa tops intersected by canyon areas. The region's topography influences air flow and the dispersal and movement of pollutants in the basin. The mountains to the east prevent air flow mixing and prohibit dispersal of pollutants in that direction.

Regional climate and local meteorological conditions influence ambient air quality. The climate of the SDAB is dominated by a semi-permanent high-pressure cell located over the Pacific Ocean. This cell, called the Pacific High-Pressure Cell (or Zone) influences the direction of prevailing winds (westerly to northwesterly) and maintains clear skies for much of the year. The high-pressure cell also creates two types of temperature inversions that may act to degrade local air quality. Subsidence inversions occur during the warmer months as descending air associated with the Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights, when air near the ground cools through radiation and the air aloft remains warm. The shallow inversion layer formed between these two air masses can also trap pollutants. During mild Santa Ana wind conditions, ambient air quality in the SDAB is affected by air quality in the South Coast Air Basin (the metropolitan areas of Los Angeles, Orange, San Bernardino, and Riverside counties). Air pollutants, specifically the components of smog, are transported to the County during relatively mild Santa Ana weather conditions. Winds blowing toward the southwest transport the polluted air from the South Coast Air Basin over the ocean. The sea breeze brings this air onshore into the County. When the transported smog is at ground level, the highest ozone (O_3) concentrations are measured at coastal and near-coastal monitoring sites. However, when the blown-in smog cloud is elevated, coastal sites may be passed over, and the transported O_3 is measured farther inland.

4.3.1.2 Criteria Air Pollutants

Criteria air pollutants are defined as those pollutants for which the federal and state governments have established air quality standards for outdoor or ambient concentrations to protect public health with a determined margin of safety. Ozone, coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) are generally considered to be regional pollutants because they or their precursors affect air quality on a regional scale. Pollutants such as carbon monoxide (CO), nitrogen dioxide (NO_2), and sulfur dioxide (SO_2) are local pollutants because they tend to accumulate in the air locally. PM is also considered a local pollutant in certain scenarios. Health effects commonly associated with criteria pollutants are summarized in Table 4.3-1.

Table 4.3-1. Summary of Criteria Air Pollutants Sources and Effects

Pollutant	Major Manufactured Sources	Human Health and Welfare Effects
CO	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, effecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
NO_2	A reddish-brown gas formed during fuel combustion for motor vehicles, energy utilities and industrial sources.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Causes brown discoloration of the atmosphere.
O_3	Formed by a chemical reaction between reactive organic gases (ROG) and nitrous oxides (N_2O) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
$PM_{2.5}$ & PM_{10}	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
SO_2	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, effecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.

Source: California Air Pollution Control Offices Association (CAPCOA) 2013

4.3.1.3 Health Risk Assessment

A Health Risk Assessment (HRA) was performed to determine the health risk associated with operations of the Proposed Project. The HRA analyzed cancer and chronic non-cancer risk calculated for 70-, 30-, 25-, and 9-year exposure scenarios for operational emissions (ECORP 2023a). Per Office of Environment Health Hazard Assessment (OEHHA) guidance, the 25-year scenario was used to model the health risk for workers at business locations and the 70-, 30-, and 9-year scenarios were used for residents in residential

areas. In addition, the maximum annual $PM_{2.5}$ concentration was modeled for comparison with SDAPCD thresholds.

4.3.2 Regulatory Setting

4.3.2.1 San Diego Air Pollution Control District

The SDAPCD has the primary responsibility for controlling emissions from construction activity throughout the SDAB. In December 2005, the SDAPCD adopted the *Measures to Reduce Particulate Matter* in the SDAB. This document identifies fugitive dust as the major source of directly emitted particulate matter in the SDAB, with mobile sources and residential wood combustion as minor contributors. Data on $PM_{2.5}$ source apportionment indicates that the main contributors to $PM_{2.5}$ in the SDAB are combustion organic carbon, and ammonium sulfate and ammonium nitrate from combustion sources. The main contributors to PM_{10} include resuspended soil and road dust from unpaved and paved roads, construction and demolition sites, and mineral extraction and processing. Based on the report's evaluation of control measures recommended by the California Air Resources Board (CARB) to reduce particulate matter emissions, the SDAPCD adopted Rule 55, the Fugitive Dust Rule, in June 2009. The SDAPCD requires that construction activities implement the measures listed in Rule 55 to minimize fugitive dust emissions. Rule 55 requires the following:

- No person shall engage in construction or demolition activity in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60-minute period.
- Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall be minimized by the use of any of the equally effective track-out/carry-out and erosion control measures listed in Rule 55 that apply to the project or operation. These measures include track-out grates or gravel beds at each egress point; wheel-washing at each egress during muddy conditions; soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; watering for dust control; and using secured tarps or cargo covering, watering, or treating of transported material for outbound transport trucks. Erosion control measures must be removed at the conclusion of each workday when active operations cease, or every 24 hours for continuous operations.

There are other SDAPCD rules and regulations, not detailed here, which may apply to the Proposed Project, but are administrative or descriptive in nature. These include rules associated with fees, enforcement and penalty actions, and variance procedures. The following additional rules and regulations would apply to the construction of the Project:

- Rule 50 *Visible Emissions:* Establishes limits to the opacity of emissions within the SDAPCD.
- Rule 51 *Nuisance*: Prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health, or safety of any such persons or the public; or which cause injury or damage to business or property.

- Rule 52 *Particulate Matter*: Establishes limits to the discharge of any particulate matter from non-stationary sources.
- Rule 54 *Dust and Fumes*: Establishes limits to the amount of dust or fume discharged into the atmosphere in any single hour.
- Rule 67.0.1 *Architectural Coatings*: Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compounds (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- Rule 67.7 *Cutback and Emulsified Asphalts:* Prohibits the sale and use of cutback and emulsified asphalt materials for the paving, construction or maintenance of parking lots, driveways, streets, and highways that exceed the County standards for the percent by volume of VOC that evaporate into the atmosphere under temperate conditions.

4.3.3 Air Quality (III) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒

No Impact.

As part of its enforcement responsibilities, the U.S. Environmental Protection Agency (USEPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in federal nonattainment areas, using a combination of performance standards and market-based programs. The SDAPCD currently monitors implementation of the SIP in the SDAB through the Regional Air Quality Strategy (RAQS), which as previously described contains strategies and tactics to be applied in order to attain and maintain acceptable air quality in the SDAB. The RAQS is the applicable air quality plan for the Proposed Project. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date. The SDAPCD has prepared the *2020 Plan for Attaining the National Ozone Standards*.

Consistency with the RAQS is determined by two standards: (1) whether the Project would increase the frequency or severity of violations of existing air quality standards, contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as contained in the RAQS; and (2) whether the Proposed Project would exceed assumptions contained in the RAQS. The air quality emission projections and emission reduction strategies in the RAQS are based on information from CARB and San Diego Association of Governments (SANDAG) regarding mobile and area source emissions. CARB mobile source emissions projections and SANDAG growth projections are derived from population and vehicle

use trends, and land use plans developed by the cities and the County of San Diego as part of their general plans. A project that proposes development consistent with the growth anticipated in a general plan would be consistent with the RAQS and *2020 Plan for Attaining the National Ozone Standards*. Projects that propose development that is greater than the population growth projections and land use intensity of the adopted local general plan warrants further analysis to determine consistency with the RAQS and the SIP.

The Project would not exceed the short-term construction standards or long-term operational standards (Tables 4.3-3 and 4.3-4) and in so doing would not violate any air quality standards. Therefore, the Project would not contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as contained in the RAQS. Thus, the Project would be consistent with the first criterion. Further, the Project proposal is consistent with the growth anticipated in the National City General Plan and therefore consistent with the second criterion.

The Project would not conflict with or obstruct implementation of the applicable air quality plan. There is no impact and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less Than Significant Impact.

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

The USEPA and CARB designate air basins or portions of air basins and counties as being in *attainment* or *nonattainment* for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. Acceptable exceedances of the maximum value vary for the National Ambient Air Quality Standards (NAAQS) from fourth highest concentration for the 8-hour O_3 standard to 99th percentile to the SO_2 standard. The NAAQS for O_3, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards (CAAQS) are not to be exceeded during a three-year period. The attainment status for the San Diego County portion of the SDAB, which encompasses the Project Area, is included in Table 4.3-2.

Table 4.3-2. Attainment Status of Criteria Pollutants in the San Diego Air Basin		
Pollutant	**State Designation**	**Federal Designation**
O_3	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Unclassified/Attainment
$PM_{2.5}$	Nonattainment	Unclassified/Attainment
CO	Attainment	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment

Source: CARB 2019

The determination of whether an area meets the state and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant The region is designated as a nonattainment area for the federal O_3 standard and is also a nonattainment area for the state standards for O_3, PM_{10}, and $PM_{2.5}$ (CARB 2019).

4.3.3.1 Construction-Related Emissions

Emissions associated with Project construction would be temporary and short term but have the potential to represent a significant air quality impact. Three basic sources of short-term emissions will be generated through construction of the Proposed Project: operation of the construction vehicles (i.e., tractors, forklifts, pavers), the creation of fugitive dust during clearing and grading, and the use of asphalt or other oil-based substances during paving activities. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts.

Construction-generated emissions associated the Proposed Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod) computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Appendix A provides more information regarding the construction assumptions, including construction equipment and duration, used in this analysis.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table 4.3-3. Construction-generated emissions are short term and of temporary duration, lasting only if construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the derived thresholds of significance.

Table 4.3-3. Construction-Related Criteria Air Pollutant Emissions

Construction Year	Pollutant (maximum pounds per day)					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Construction First Year	24.13	71.86	67.54	0.14	13.69	16.72
SDAPCD Potentially Significant Impact Threshold	*75*	*250*	*550*	*250*	*100*	*67*
Exceed SDAPCD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod version 2020.4.0. Refer to Appendix A for Model Data Outputs.
Notes: Construction emissions taken from the season (summer or winter) with the highest output. Building construction, paving, and architectural coating assumed to occur simultaneously. Emission calculations account for the movement and export of 30,000 cubic yards of local soil and import of 30,000 cy of offsite material.

As shown in Table 4.3-3, emissions generated during Project construction would not exceed the SDAPCD's thresholds of significance. Therefore, criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard.

4.3.3.2 Operational Emissions

Implementation of the Project would result in long-term operational emissions of criteria air pollutants such as PM_{10}, $PM_{2.5}$, CO, and SO_2 as well as O_3 precursors such as ROG and nitrogen oxides (NO_X). Predicted maximum daily operational-generated emissions of criteria air pollutants for the Proposed Project are summarized in Table 4.3-4 and compared to the operational significance thresholds promulgated by the SDAPCD. Operational emissions were estimated using CalEEMod and estimated emissions for fuel transport fugitive leaks calculated by the applicant. USEPA AP-42 Section 5.2 was used to estimate the emissions from the transloading process.

Table 4.3-4. Operational Criteria Air Pollutant Emissions

Emission Source	Pollutant					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Summer Emissions (Pounds per Day)						
CalEEMod Sources	7.17	1.23	10.12	0.02	2.36	0.64
Calculated Fugitive Evaporation	34.37	--	--	--	--	--

Table 4.3-4. Operational Criteria Air Pollutant Emissions						
Emission Source	**Pollutant**					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Project Emissions	41.54	1.23	10.12	0.02	2.36	0.64
Winter Emissions (Pounds per Day)						
CalEEMod Sources	7.14	1.32	10.36	0.02	2.36	0.64
Calculated Fugitive Evaporation	32.27	--	--	--	--	--
Project Emissions	39.41	1.32	10.36	0.02	2.36	0.64
Daily Significance Threshold	75	250	550	250	100	67
Exceed Daily Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2020.4.0. Refer to Appendix A for Model Data Outputs.
Notes: Operational emissions for the Proposed Project fugitive VOC/ROG emissions calculated by applicant.

As shown in Table 4.3-4, the Project's emissions would not exceed any SDAPCD thresholds for any criteria air pollutants during operations. A less than significant impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Less than Significant Impact.

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over age 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The Project Area is surrounded by a Costco Optical Laboratory directly to the west, and industrial and retail on all other sides. The nearest sensitive receptor is McKinley Apartments, approximately 200 feet east of the Project. The nearest school is Kimball Elemental School located approximately 0.4 mile east of the Project Area.

According to the SDAPCD, an air quality impact is considered significant if the proposed Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SDAPCD has

established thresholds of significance for air quality for construction and operational activities of land use development projects, such as that proposed, as shown in Table 4.3-5.

Table 4.3-5. SDAPCD Significance Thresholds – Pounds per Day

Air Pollutant	Construction Activities	Operations
Reactive Organic Gas	75	75
Carbon Monoxide	550	550
Nitrogen Oxide	250	250
Sulfur Oxide	250	250
Coarse Particulate Matter	100	100
Fine Particulate Matter	67	67

In addition to the emission of criteria air pollutants, this Project evaluates the health risk from operations. Specifically, the potential exposure of nearby existing residents to diesel particulate matter (DPM) primarily from heavy duty trucks. Operational emissions sources include onsite and offsite trucks and rail traffic. There is no increase in locomotive and switch engine trips associated with this Project, however there would be switching tracks in a new location. As the HRA is focused on local emissions the switching engine emissions were included in the HRA.

There are small amounts of TACs emitted from the additives used for renewable diesel including lubricity and red dye. These emissions include xylene and ethylbenzene. However, these emissions are well under their reportable levels. The VOC emissions from additives are less than a pound per year. Therefore, the effects of these TACs are considered negligible and they are not analyzed in this assessment. In addition, there are small amounts of TACs included with the gasoline residual associated with the denatured ethanol which are also under a pound per year of benzine and considered negligible.

The SDAPCD thresholds for what constitute an exposure of substantial air toxics are as follows.

- *Cancer Risk*: Emit carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million.
- *Non-Cancer Risk*: Emit toxic contaminants that exceed the maximum hazard quotient of 1 in one million.

Cancer risk is expressed in terms of expected incremental incidence per million population. The SDAPCD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer risk due to toxic air contaminants (TAC) exposure. This threshold serves to determine whether a given project has a potentially significant development-specific and cumulative impact. The 10-in-one-million standard is a very health-protective significance threshold. A risk level of 10 in one million implies a likelihood that up to 10 persons out of one million equally exposed people would contract cancer if

exposed continuously (24 hours per day) to the levels of TACs over a specified duration of time. This risk would be an excess cancer that is in addition to any cancer risk borne by a person not exposed to these air toxics. To put this risk in perspective, the risk of dying from accidental drowning is 1,000 in a million, which is 100 times more than the SDAPCD's threshold of 10 in one million.

The SDAPCD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a *hazard index*, expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). A REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than 1.0 means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less than significant.

4.3.3.3 Cancer Risk

Operational cancer risk calculations for existing residential receptors are based on 70-, 30-, and 9-year exposure periods and worker receptors are based on a 25-year exposure period to for. the calculated cancer risk accounts for 350 days per year of exposure to residential receptors. While the average American spends 87 percent of their life indoors (USEPA 2001), neither the pollutant dispersion modeling nor the health risk calculations account for the reduced exposure structures provide. Instead, health risk calculations account for the equivalent exposure of continual outdoor living. The calculated carcinogenic risk at Project vicinity receptors is depicted in Table 4.3-6.

Table 4.3-6. Maximum Cancer Risk Summary

Maximum Exposure Scenario	Total Maximum Risk
Project Operations	
70-Year Exposure Resident	6.787
30-Year Exposure Resident	5.957
9-Year Exposure Resident	4.231
25-Year Exposure Worker	0.848
Significance Threshold	10
Exceed Threshold?	No

Source: ECORP 2023a. See Appendix A.

As shown, Project operations do not result in a significant contribution to cancer risk in the community. These calculations do not account for any pollutant-reducing remedial components inherent to the Project or the Project Area.

4.3.3.4 Non-Carcinogenic Hazards

In addition to cancer risk, the significance thresholds for TAC exposure requires an evaluation of non-cancer risk stated in terms of a hazard index. An acute or chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the REL. The highest maximum chronic hazard indexes for residents and workers in the Proposed Project vicinity as a result of operations emission exposure is shown in Table 4.3-7. No acute health risk is associated with DPM under current OEHHA guidelines, thus acute health risk cannot be quantified for the Project.

Table 4.3-7. Maximum Non-Carcinogenic Health Risk Summary

Exposure Scenario	Chronic Hazard Values		
	Maximum Residential Hazard	**Maximum Worker Hazard**	**Maximum Sensitive Receptor Hazard**
Operation	0.002	0.002	0.0001
Significance Threshold	*1*	*1*	*1*
Exceed Threshold?	**No**	**No**	**No**

Source: ECORP 2023a. See Appendix A.

As shown in Table 4.3-7, impacts related to non-cancer risk (chronic hazard index) because of the Project are less than significant.

In summary, the Project would not result in a significant contribution to the adverse health impacts associated with those pollutants to nearby sensitive receptors. A less than significant impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

No Impact.

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell minute

quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word "strong" to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

During construction, the Proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the Project Area. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people to odor emissions.

According to the CARB Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005), the sources of the most common operational odor complaints received by local air districts include facilities such as sewage treatment plants, landfills, recycling facilities, petroleum refineries, and livestock operations. The Project does not contain any of the land uses identified as typically associated with emissions of objectionable odors. No impact would occur, and no mitigation is required.

4.3.4 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.4 Biological Resources

4.4.1 Surveys

A biological reconnaissance survey was conducted on March 17, 2022, to determine the vegetation communities and wildlife habitats in the Biological Study Area (BSA). The BSA includes the client-provided Project boundaries plus a 500-foot buffer. The Project boundary at the time of survey was approximately 10.9 acres, but has been refined to 7.5 acres over the course of Project planning. The BSA was also examined to assess its potential to provide habitat for special-status plant and wildlife species and its

potential to facilitate wildlife movement or function as a movement corridor for wildlife throughout the region (ECORP 2022b; Appendix B).

An aquatic resources delineation was conducted on March 17, 2022, to identify potentially jurisdictional areas in the Delineation Area (DA). The DA used includes client-provided Project boundaries (Project Area) plus a 50-foot buffer. In addition to potentially jurisdictional areas, stream conditions were assessed to properly classify features as ephemeral, intermittent, or perennial waters. A combination of hydrological, geomorphic and biological indicators was used to determine the hydrologic nature of each drainage. In addition, each drainage was evaluated for the presence or absence of bed and bank, a natural line impressed in the bank, sediment deposits, changes in the character of soil, destruction of terrestrial vegetation, litter/debris (wrack), leaf litter disturbance, water stains, soil shelving, and exposed roots indicating active hydrology within the channel (ECORP 2022c; Appendix C).

A focused rare plant survey was conducted on June 22, 2022, during the appropriate blooming period for special-status plants species determined to have potential to occur (Appendix B), particularly the target plant species San Diego Ambrosia (*Ambrosia pumila)*. San Diego ambrosia was the highest priority target species because it is a federally listed endangered and California Rare Plant Rank (CRPR) 1B.1 species due to the disturbed nature of the Project Area and recent, close-proximity occurrences within the literature review search. A plant species compendium was compiled during the survey event and additional species observed were added to the master plant species compendium for the Project. Plants that could not be identified in the field were sampled so that a dissecting microscope could be used for plant identification. Taxonomy of plant species identified within the BSA followed that of *The Jepson Manual: Vascular Plants of California* (Baldwin et al. 2012).

4.4.2 Environmental Setting

Although most of the planning area is fully developed with residential, commercial, industrial, and military uses, various natural areas are found scattered throughout the planning area. Many of these natural areas have been altered from their original state, including the channelization of many watercourses. Natural and/or undeveloped areas present within the planning area consist mainly of canyons, undeveloped slopes, several drainages, a portion of the Sweetwater River, Paradise Marsh, and Paradise Creek (City of National City 2011b).

The Project Area is approximately 7.5 acres and is primarily unimproved and undeveloped. The area was formerly used for railroad and industrial purposes. A portion of the area contains four closed release cases, and one open release case is located on the adjoining/adjacent properties. The open remediation case is the PSI property located adjacent and east of the Project Area. The Project Area is located in the IM zone within the Coastal Zone overlay.

4.4.2.1 Vegetation Communities

Vegetation within the Project Area is composed of disturbed mulefat thickets and ornamental vegetation. Two additional land cover types occur within the Project Area and include developed and disturbed.

Disturbed Mulefat Thickets (Disturbed Baccharis salicifolia Shrubland Alliance)

Mulefat thickets are characterized as having mulefat dominant or co-dominant in the shrub canopy, typically with other native plant species. Within the Project Area, mulefat thickets are disturbed with sparse cover of mulefat and broom baccharis (*Baccharis sarothroides*) intermixed with nonnative and ornamental species such as red brome (*Bromus madritensis* ssp. *rubens*) and golden wattle (*Acacia pycnantha*). This vegetation community was not associated with any drainages and is present within an upland area of disturbed soils within the Remediation Area. Mulefat is known to be a colonizer of disturbed sites and is not considered a sensitive vegetation community.

Ornamental

The ornamental classification consists of vegetation that has been landscaped. The ornamental area of the Project Area is at the southern end of the Remediation Area and is comprised primarily of golden wattle intermixed with nonnative species such as red brome and sweet fennel (*Foeniculum vulgare*).

Other Land Cover Types

Disturbed

Disturbed is not a vegetation classification, but rather a land cover type and is not typically restricted to a known elevation. The disturbed classification includes areas where the native vegetation community has been heavily influenced by human actions, such as grading, trash dumping, and dirt roads, but lacks development. Disturbed areas of the Project Area included a large portion of the Remediation Area, a majority of the Project Area situated between the railroad and parking lot. Some of these disturbed areas had remnant native plant species present; however, cover was scattered and intermittent. An active dump site and a homeless encampment were observed within the disturbed areas. In areas classified as disturbed, vegetation was absent or consisted primarily of nonnative species, such as tamarisk (*Tamarix* sp.), foxtail barely (*Hordeum murinum*), Russian thistle (*Salsola tragus*), smilo grass (*Stipa miliacea*), yellow sweet clover (*Melilotus indicus*), and crown daisy (*Glebionis coronaria*).

Developed/Urban Lands

Developed lands are those that are heavily affected by human use, including landscaping, residential homes, commercial or industrial buildings and associated infrastructure, and transportation corridors. Within the Project Area this included the parking lot, materials storage yard, and railroad tracks. Within the larger BSA, this included surrounding commercial buildings and roads. Landscaped areas consisted primarily of ornamental species Mexican fan palm (*Washingtonia robusta*) and sea lavender (*Limonium perezii*) as well as nonnative species including tree tobacco (*Nicotiana glauca*), rabbitfoot grass (*Polypogon monspeliensis*), and crown daisy.

4.4.2.2 Plants

Plant species observed within the Project Area were generally characteristic of disturbed and ornamental vegetation communities. Special-status plants were not observed during the reconnaissance survey. Nonnative plant species observed on the Proposed Project were dominant within the disturbed areas,

intermittently found within the disturbed native vegetation communities and amongst the ornamental vegetation. A full list of plant species observed on the Proposed Project is included in Appendix B.

4.4.2.3 Wildlife

Wildlife species observed within the BSA included those typical of urban environments such as rock pigeon (*Columba livia*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), house finch (*Haemorhous mexicanus*), and Anna's hummingbird *(Calypte anna*). Special-status wildlife was not observed. ECORP biologists observed 17 bird species and four insect species during the reconnaissance survey (ECORP 2022b). A full list of wildlife species observed on the Proposed Project is included in Appendix B.

4.4.2.4 Soils

A soils analysis search was conducted using the Web Soil Survey data and two soil types occur in the BSA, Huerhuero-Urban land complex and Md Made land (ECORP 2022b). Soil characteristics observed in the field were generally consistent with what has been identified for these soil units and their official series descriptions.

4.4.2.5 Potential Waters of the U.S.

As a result of the aquatic resources delineation, two brow-ditches and one depressional feature were identified as aquatic resources. Features identified as an aquatic resource have wetland indicators present and/or physical evidence of flow including ordinary high-water mark (OHWM), defined bed and bank, presence of a clear and natural line impressed on the bank, the presence or absence of sediment deposits, litter/debris, and/or exposed roots indicating active hydrology within the channel.

Features 1 and 2 are the two brow-ditches functioning as stormwater conveyance systems. These features displayed ephemeral characteristics. These features daylight within the Project Area but enter and exit culverts underground. The features are dry or mostly dry, with straight, confined channels. There is minimal or no compositional difference between upland and riparian corridors along these channels and the soil particle size inside the channels are the same or roughly the same as the soil particle size outside of the channels. These features contain rooted upland plants within the streambed.

One 0.144-acre depressional feature exists within the southwest portion of the DA. According to aerial imagery, this the location of the current depression used to have partial overlap with Harrison Avenue (compacted road base) and the other half was covered by a concrete lot that was removed in approximately 2018. Ponding is evident on aerial imagery beginning in 2018. Review of aerial imagery for 2018 reveals that after the concrete lot was removed, off-highway vehicle (OHV) use occurred with some regularity and multiple tracks through the depression are evident as well as mud splatter marks in all directions indicating vehicles were repeatedly driving through the depression. During field work deep tire ruts were visible in the depression. The elevation of the depression was likely at or near that of Harrison Avenue in 2018, however OHV activities likely lowered the elevation of the depression. At the time of the survey this depression did not have standing water but there were dried algal mats present.

There are three manufactured drainage culverts and two storm drain inlets that generally serve the purpose of conveying stormwater and urban runoff underneath local roads, the railroad, and surrounding developed areas. These consist mostly of concrete features with metal drainage pipes that range from approximately one to two feet in diameter. They are largely unvegetated and lack a natural bed and bank. These features are likely associated with municipal storm sewer systems.

The features observed and/or mapped within the DA do not appear to be tributary to Traditional Navigable Waters (TNW) or connected to interstate waters based on the field assessment and an assessment of aerial photographs, but rather the various features located in the DA are considered isolated. If the drainages recorded within the DA do not connect downstream to TNW or to Interstate Waters, as determined by the U.S. Army Corps of Engineers (USACE), then these aquatic resources may not be subject to regulation under the Clean Water Act (CWA). However, the depressional feature located within the DA is considered to be potentially jurisdictional under the California Coastal Act (CCA). Under the CCA, the presence of a single criteria/parameter (i.e., wetland vegetation or hydric soils or wetland hydrology) is sufficient to make a presumptive finding for the presence of wetlands. As such, wetlands defined under the CCA are more extensive in the DA as compared to USACE wetlands.

According to Regulatory Guidance Letter (08-02), an Applicant "may elect to use a preliminary Jurisdictional Determination (JD) to voluntarily waive or set aside questions regarding CWA/Rivers and Harbors Act of 1899 (RHA) jurisdiction over a particular site, usually in the interest of allowing the landowner or other 'affected party' to move ahead expeditiously to obtain a Corps permit authorization where the party determines that it is in his or her best interest to do so". A significant nexus evaluation is not necessary to obtain a preliminary JD. An approved JD by the USACE would be necessary to determine if jurisdictional Waters of the U.S. are absent (ECORP 2022c).

4.4.2.6 Special-Status Plants

Numerous special-status plant species have been recorded within five miles of the Project Area, according to the California Natural Diversity Database (CNDDB; California Department of Fish and Wildlife [CDFW] 2022), Information for Planning and Consultation (IPaC) (U.S. Fish and Wildlife Service [USFWS] 2022), and California Native Plant Society's Electronic Inventory (CNPSEI; California Native Plant Society [CNPS] 2022). Of all available records, 72 special-status plant species were identified as those with the potential for occurrence within the vicinity of the Project Area. One species was present within the Project Area and the remaining 71 species were presumed absent based on their known habitat not occurring within the Project Area (Appendix B).

Special-Status Plant Species Present

Nuttall's acmispon (*Acmispon prostratus*) is designated as a CRPR 1B.1 plant species. This plant is known to occur at elevations between 0 and 10 meters (0 and 33 feet) and blooms between March and July. Nuttall's acmispon is known to inhabit coastal dunes and sandy soils of coastal scrub. Eight CNDDB observations of this species occur within a 5-mile radius of the Project Area, five of which are within the last 20 years. The nearest record is 0.45 miles south of the Project Area from 2011 where it was observed growing in disturbed vegetation adjacent to the railroad tracks within the San Diego Bay National Wildlife Refuge. Potential habitat occurs within the Project Area for this species in the sandy soils of the disturbed

habitats. This species was not observed during the biological reconnaissance survey but was identified during the focused rare plant survey effort growing in the area with loose sandy soils.

4.4.2.7 Special-Status Wildlife

The literature search documented 31 special-status wildlife species in the vicinity of the Proposed Project, 10 of which are federally and/or state-listed under the federal or California ESAs, respectively. Of the 31 special-status wildlife species identified in the literature review, two were found to have a moderate potential to occur and nine were found to have a low potential to occur; the remaining 20 species are presumed absent from the Project Area. None of the wildlife species were determined to have a high potential to occur (Appendix B).

4.4.2.8 Wildlife Movement Corridors

The concept of habitat corridors addresses the linkage between large blocks of habitat that allow the safe movement of mammals and other wildlife species from one habitat area to another. The definition of a corridor is varied, but corridors may include such areas as greenbelts, refuge systems, underpasses, and biogeographic land bridges, for example. In general, a corridor is described as a linear habitat, embedded in a dissimilar matrix, which connects two or more large blocks of habitat. Wildlife movement corridors are critical for the survivorship of ecological systems for several reasons. Corridors can connect water, food, and cover sources, spatially linking these three resources with wildlife in different areas.

In addition, wildlife movement between habitat areas provides for the potential of genetic exchange between wildlife species populations, thereby maintaining genetic variability and adaptability to maximize the success of wildlife responses to changing environmental conditions. This is especially critical for small populations subject to loss of variability from genetic drift and effects of inbreeding. The nature of corridor uses and wildlife movement patterns varies greatly among species.

ECORP assessed the Proposed Project for its ability to function as a wildlife corridor. The Project Area is surrounded by urban development with major roads that block wildlife movement through the area. Furthermore, the Proposed Project does not connect valuable blocks of habitat and lacks valuable habitat itself.

4.4.3 Biological Resources (IV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

4.4.3.1 Special-Status Plants

The literature review resulted in 72 special-status plant species with potential to occur on the Proposed Project. Of these 72 special-status plants, one special-status plant species, Nuttall's acmispon, was observed with in the Project Area.

If present, direct impacts to rare or special-status plant species may occur as a result of the Proposed Project in the form of mortality or injury due to ground-disturbing and vegetation removal activities within the Project Area. Indirect impacts to rare or special-status plant species may occur due to habitat degradation and increased dust if present in the areas adjacent to the Project Area. Impacts to rare plant species would be less than significant with the implementation of Mitigation Measure **BIO-1**.

4.4.3.2 Special-Status Wildlife Species

The results of the literature review and reconnaissance-level survey identified no special-status wildlife species present and 31 special-status wildlife species with potential to occur within the BSA. Of these 31 special-status wildlife species, two special-status wildlife species (osprey and western yellow bat), have a moderate potential to occur within the BSA due to the presence of highly suitable habitat and recent occurrences within 5 miles. Nine special-status wildlife species have a low potential to occur and 20 special-status wildlife species are presumed absent. Special-status wildlife species were not encountered within the proposed Project Area during the biological resources survey, and focused surveys were not conducted.

An osprey was observed flying to the west of the Project Area during the reconnaissance survey. Osprey are large birds of prey that feed mainly on fish. They tolerate a wide variety of habitats and nest in any location near a body of water providing an adequate food supply. They have been documented in San Diego nesting on utility poles and light fixtures in urban areas adjacent to bodies of water. Although there is low likelihood of nesting of osprey within the Project Area itself, there is potential for nesting within the buffer of the Project Area and the bay nearby provides suitable foraging habitat. Therefore, this species could be indirectly impacted by development of the Proposed Project. Implementation of Mitigation Measure **BIO-2** would reduce impacts to osprey and other special-status bird species to a less than significant level.

The palm trees located within the Project Area and buffer may provide roosting habitats for bat species, particularly western yellow bat, a Species of Special Concern (SSC) species. These trees could function as maternity roost sites for this species. Bat species in California are protected by Section 4150 (protection of non-game mammals from take) of the California Fish and Game Code. Section 4150 of the California Fish and Game Code prohibits the take of any naturally occurring mammals in California that are nongame mammals, which includes all species of the Order Chiroptera (bats).

All bat species with potential for occurrence for the Project are SSC species and Project-related impacts to bat species and bat maternity roosts are potentially significant. Impacts to bat species are expected to be temporary in nature and individual bats are expected to be able to vacate the trees that are removed during construction without being subject to harm if a two-step palm tree removal process is conducted. The two-step removal process for palm trees involves the following:

- The uppermost live fronds (the top of the tree) should be removed entirely on the first day along with the upper 25 percent of the frond skirt. This method would allow for sufficient disturbance of the tree that would encourage any roosting bats within the frond skirt to abandon the tree during evening emergence without directly impacting roosting bats within the skirt. The remainder of the tree should be removed the following day.
- If bats emerge at any time during the tree trimming, trimming activities should cease at that individual tree for the remainder of the day to allow for any additional bats roosting in the tree to emerge during evening hours when it is safe and appropriate for them to do so. Trimming of the tree may resume the following morning.
- Tree trimming activities in the fall should be conducted on days when weather conditions are such that roosting bats are unlikely to be in torpor (i.e., predicted overnight lows on evenings before and after the tree trimming activities are above 45°F) to the extent practicable.

Implementation of Mitigation Measure **BIO-3** would reduce impacts to bat species and maternity roosts to a less than significant level.

If present, direct impacts to rare or special-status wildlife species may occur as a result of the Proposed Project in the form of mortality or injury due to ground-disturbing and vegetation removal activities within the Project Area. Indirect impacts to rare or special-status wildlife species may occur due to habitat degradation, edge effects, construction noise, and other associated construction activities if present in the areas adjacent to the Project Area. Impacts to special-status wildlife species would be less than significant with the implementation of Mitigation Measure **BIO-2** and **BIO-3**.

4.4.3.3 Raptors and Migratory Birds

The vegetation within the proposed Project and infrastructure adjacent to the site (e.g., utility poles, existing buildings) could provide nesting habitat for nesting birds and raptors protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, and also provides foraging habitat for songbird and raptor species. If construction of the proposed Project occurs during the bird breeding season (typically February 1 through August 31 for passerines and January 15 through July 31 for raptors), ground-disturbing construction activities could directly affect MBTA-protected birds and their nests through the removal of habitat on the Proposed Project, and indirectly through increased noise, ground vibrations, and increased human activity. Implementation of Mitigation Measure **BIO-2** would reduce impacts to a less than significant level.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 U.S. Fish and Wildlife Service?	☐	☐	☐	☒

No Impact.

The Proposed Project consists of disturbed vegetation communities and disturbed and developed land. These vegetation communities and land covers are not considered sensitive to local, state, or federal agencies; therefore, there is no impact and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

Under the CCA, the presence of a single criteria/parameter is sufficient to make a presumptive finding for the presence of wetlands. As such, wetlands defined under the CCA are more extensive in the DA as compared to USACE wetlands. Under the CCA, potential wetlands defined by the California Coastal Commission total 0.144 acre. One depressional feature exists within the southwest portion of the DA. The location of the current depression used to have partial overlap with Harrison Avenue (compacted road base) and the other half was covered by a concrete lot that was removed in approximately 2018. Review of aerial imagery for 2018 reveals that after the concrete lot was removed, OHV use occurred with some regularity and multiple tracks through the depression are evident as well as mud splatter marks in all directions indicating vehicles were repeatedly driving through the depression. During field work deep tire ruts were visible in the depression. The elevation of the depression was likely at or near that of Harrison Avenue in 2018, however OHV activities likely lowered the elevation of the depression. At the time of the survey this depression did not have standing water but there were dried algal mats present.

The features observed and/or mapped within the DA do not appear to be tributary to TNW or connected to interstate waters based on the field assessment and an assessment of aerial photographs, but rather than various features located in the DA are considered isolated. If the drainages recorded within the DA do not connect downstream to TNW or to Interstate Waters, as determined by the USACE, then these aquatic resources may not be subject to regulation under the CWA. However, the depressional feature located within the DA is considered to be potentially jurisdictional under the CCA.

According to Regulatory Guidance Letter (08-02), an Applicant "may elect to use a preliminary JD to voluntarily waive or set aside questions regarding CWA/RHA jurisdiction over a particular site, usually in the interest of allowing the landowner or other 'affected party' to move ahead expeditiously to obtain a Corps permit authorization where the party determines that it is in his or her best interest to do so. " A significant nexus evaluation is not necessary to obtain a preliminary JD. An approved JD by the USACE would be necessary to determine if jurisdictional Waters of the U.S. are absent.

For impacts to CCA areas, the Project would require consistency with the Local Coastal Program (LCP) and concurrence with the City, who presides over the LCP.

No resources waters of the U.S./State have been mapped within the DA. However, a single depressional feature that is likely jurisdictional under the CCA has been mapped. This acreage and extent represent a calculated estimation of the jurisdictional area within the proposed Project and is subject to modification during the agency verification process. Fill within jurisdictional features to the CCA would require City concurrence pursuant to the LCP (ECORP 2022c).

Impacts would be less than significant and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Proposed Project was assessed for its ability to function as a wildlife corridor. The Project Area is surrounded by urban development with major roads that block wildlife movement through the area. Furthermore, the Proposed Project does not connect valuable blocks of habitat and lacks valuable habitat itself. The disturbed habitats within the Project Area provides an island of foraging and nesting habitat for wildlife species but they are not considered sensitive ecological areas. No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

No Impact.

The City's Municipal Code, Chapter 13.18 – Street Trees and Parkway Landscaping, specifically pertains to City trees. Every effort should be made to protect city trees during construction. If construction activity, or the movement of equipment will take place within the dripline area of any City tree, a fenced tree protection zone shall be established by the city engineer, or designee, except that the fenced area shall not include private property (City of National City 2019b). The Proposed Project consists of disturbed vegetation communities and disturbed and developed land. No City trees will be affected by the Proposed Project. No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Proposed Project is not located within a Habitat Conservation Plan or Natural Community Conservation Plan area; therefore, the Proposed Project does not need to be consistent with any plans. No impact would occur and no mitigation is required.

4.4.4 Mitigation Measures

BIO-1: **Rare Plant Salvage.** Rare plant surveys were conducted within suitable habitat on the Proposed Project during the appropriate blooming periods (i.e., between April and October) following sufficient rainfall during the previous wet season for the special-status plant species with potential to occur on or immediately adjacent to the Proposed Project. The survey was conducted by a botanist or qualified biologist in accordance with the USFWS General Rare Plant Survey Guidelines (USFWS 2002); the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018); and the CNPS Botanical Survey Guidelines (CNPS 2001). Project-related impacts to the Nuttall's acmispon are anticipated to be unavoidable, therefore salvage of seed and donation to a refuge, (e.g., Sweetwater Marsh National Wildlife Refuge) is recommended. A qualified biologist shall collect seed from the Nuttall's acmispon during the appropriate time, store under appropriate conditions, and coordinate with the refuge manager in order to apply seed within the refuge boundaries. Seed shall be collected during July 2022 and the subsequent spring (2023), provided that the Project has not reached construction phase and the plant is present.

BIO-2: **Pre-Construction Survey for Nesting Birds and Special-Status Avian Species.** Where feasible, ground-disturbing activities, including vegetation removal, shall be conducted during the non-breeding season (approximately September 1 through January 14) to avoid violations of the MBTA and California Fish and Game Code §§ 3503, 3503.5 and 3513. Several species identified as having potential to nest year-round; therefore, regardless of time of year, a preconstruction survey for nesting birds and special-status avian species shall be conducted by a qualified biologist (experienced in the identification of avian species and conducting nesting bird surveys) if activities with the potential to disrupt nesting birds or special-status avian species are scheduled to occur. The survey shall include the Proposed Project and adjacent areas where Project activities have the potential to cause nest failure. The pre-construction survey shall be conducted no more than three days prior to the start of ground-disturbing activities (including vegetation removal) within the bird breeding season.

Site preparation and construction activities may begin if no nesting birds or special-status avian species are observed during the survey. If nesting birds or raptors or special-status avian species are found to be present, avoidance or minimization measures shall be implemented to avoid potential Proposed Project-related impacts to the species. Avoidance and minimization measures shall be developed by the qualified biologist and may include seasonal work restrictions, additional survey and monitoring requirements, or non-disturbance buffers established around active nests until the biologist has determined that the nesting cycle is completed. The width of non-disturbance buffers established around active nests will be determined by the qualified biologist (300 feet is typically recommended for songbirds and 500 feet is typically recommended for raptors). Once nesting is deemed complete by the qualified biologist as determined through periodic nest monitoring, the non-disturbance buffer will be removed by the qualified biologist and Proposed Project work may resume in the area.

BIO-3: **Compliance with Section 4150 of California Fish and Game Code.** To avoid impacts to bat species, a qualified bat biologist should conduct an appropriate combination of sampling, exit counts, and acoustic surveys to determine if bats are using the palm tree resources in the Project Area. If Project-related impacts to bat species are unavoidable, additional measures may need to be implemented to reduce or eliminate impacts to bat species, including maternity roosts, such as tree removal occurring outside of bat breeding season (October through February) or two-step, two-day removal of palm trees under supervision of a qualified bat biologist.

4.5 Cultural Resources

4.5.1 Environmental Setting

4.5.1.1 Ethnohistory

During the Lake Prehistoric Period, National City was part of the territory of the Kumeyaay. The Kumeyaay (also known as Ipai and Tipai) are the Yuman-speaking native people of central and southern San Diego County and the northern Baja Peninsula in Mexico. The ancestral lands of the Kumeyaay extend north from Todos Santos Bay near Ensenada, Mexico to Agua Hedionda Lagoon in north San Diego County, and east to the west side of the Imperial Valley. The Kumeyaay were geographically and linguistically divided into western and eastern Kumeyaay. The western Kumeyaay lived along the coast and in the valleys along the drainages west of the mountains. The eastern Kumeyaay lived in the canyons and desert east of the mountains. The Kumeyaay population was estimated to be between 10,000 and 20,000 at the time of European contact, based on Spanish accounts and ethnographies (ECORP 2022d).

4.5.1.2 Property Specific History

The Project Area is located in an area that consisted of portions of blocks 274 and 275 in National City and, west of Harrison (formerly 9th) Avenue, the Atchison, Topeka, & Santa Fe (AT&SF) railroad grounds. The western boundary of the Project Area are the tracks of the Coronado Railroad, also called the "Belt Line," built in 1888 by John D. Spreckels, a San Diego civic leader and builder of Hotel Coronado. The

Coronado Railroad delivered building materials, and then passengers, south from San Diego through the AT&SF grounds at National City and then north up the Silver Strand to Coronado Island and the hotel site. In 1908, Spreckels merged the Coronado Railroad with its competitor, the National City & Otay (NC&O) Railway. Spreckels then integrated both into the new San Diego & Arizona Railway (SD&A) system, a Southern Pacific-affiliated transcontinental main line from San Diego to Yuma. In 1951, the Samuel Vener Company of Los Angeles built a celery packing shed at 1840 Harrison Avenue, on the AT&SF grounds immediately north of 18th Street, between the Coronado Railroad tracks to the west and Harrison Avenue to the east. Immediately north of the Vener packing shed, at 1802 Harrison Avenue, Martin Ito, a longtime San Diego County produce grower, established a similar packing shed which handled many varieties of produce (ECORP 2022d).

4.5.2 Cultural Resources Inventory and Evaluation

A Cultural Resources Inventory and Evaluation Report was prepared by ECORP Consulting, Inc. (ECORP 2022d) for the Proposed Project to determine if cultural resources were present in or adjacent to the Area of Potential Effects (APE) and assess the sensitivity of the APE for undiscovered or buried cultural resources. The terms Project Area and APE are interchangeable for the purpose of this document. The inventory included a records search, literature review, and field survey.

A records search for the property was requested from the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University on January 28, 2022. The purpose of the records search was to determine the extent of previous surveys within a one-mile radius of the Proposed Project location, and whether previously documented precontact or historic-period archaeological sites, architectural resources, or traditional cultural properties exist within this area. The records search results indicate that 65 cultural resources investigations had previously been conducted in or within one mile of the Project Area. Five of these previously conducted investigations overlap a portion of the Project Area. Seventy-five cultural resources were previously recorded within one mile of the Project Area as a result of these investigations. Two cultural resources have been previously identified within the Project Area: P-37-013073, the Coronado Railroad; and P-37-024739, the Burlington Northern Santa Fe (formerly Atchison, Topeka and Santa Fe) Railway. P-37-013073 was previously evaluated and found not eligible for inclusion on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). P-37-024739 was previously evaluated and found eligible for the NRHP and CRHR.

Additional sources were reviewed for the cultural resources inventory and evaluation. The National Register Information System did not list any eligible or listed properties within the Project Area. No California Historical Landmarks were identified within the Project Area. A search of historic GLO land patent records from the Bureau of Land Management's (BLM) patent information database revealed no Public Land Survey System survey records. The Project Area overlaps a portion of the El Rancho de la Nación land grant awarded by the Mexican Governor of California, Pio Pico, to his brother-in-law, John Forester, in 1845. An 1840s map of the rancho produced by Forester shows no evidence of buildings or structures on the property. The Caltrans Bridge Local and State Inventories does not list any historic bridges in the Project Area.

The NAHC was contacted on January 28, 2022 to request a search of the Sacred Lands File for the Project Area. In requesting a search of the Sacred Lands File, information from the Native American community regarding tribal cultural resources was solicited, but the responsibility to formally consult with the Native American community lies exclusively with the federal and local agencies under applicable state and federal law. ECORP was not delegated authority by the lead agencies to conduct tribal consultation. The search of the Sacred Lands File was negative and failed to indicate the presence of Native American cultural resources in the Project Area.

On May 3, 2022, a pedestrian survey was conducted for the approximate 10.9-acre Project Area. The Project boundary at the time of survey was approximately 10.9 acres, but has been refined to 7.5 acres over the course of Project planning. At that time, developed and exposed ground surfaces were examined for indications of surface or subsurface cultural resources. No subsurface investigations or artifact collections were undertaken during the pedestrian survey. Of special note is that a large portion of the Project Area extending along the eastern edge of the Project Area was not accessible during the survey. This portion of the Project Area is contaminated with heavy metals, volatile organic compounds, total petroleum hydrocarbons, and polychlorinated biphenyl and is undergoing remediation under the direction of DTSC as lead agency. ECORP relocated and recorded portions of historic-period sites P-37-013073 and P-37-024739 during the field survey and found that P-37-013073 remains not eligible for inclusion on the NRHP or CRHR, while P-37-024739 remains eligible for inclusion on the NRHP and CRHP. ECORP also identified and recorded six historic-period sites, NCD-001, NCD-002, NCD-003, NCD-004, NCD-005, and NCD-006. ECORP found that none of these previously unrecorded resources are eligible for inclusion on the NRHP or CRHP under any criteria (ECORP 2022d).

4.5.3 Cultural Resources (V) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

City's General Plan Open Space and Agriculture Element identifies cultural and paleontological resources located within the City. Thirty cultural resources were identified within National City, nine of which are prehistoric and 21 of which are historical resources. The historic properties list included 99 historic structures including those already on the National Register, however, most of the buildings on the lest have not been evaluated for their potential ability to be listed on the NRHP. There are four structures in the City that have been placed on the NRHP and are also considered significant by the state: Granger Music Hall, Brick Row, the Santa Fe Rail Depot, and St. Matthew's Episcopal Church; none of these structures are within or near the Project Area (City of National City 2011b).

ECORP evaluated cultural resources NCD-001, NCD-002, NCD-003, NCD-004, NCD-005, and NCD-006. ECORP found that none of these resources are eligible for inclusion on the NRHP or CRHP under any

criteria. Additionally, ECORP revisited sites P-37-013073 and P-37-024739 and found that P-37-013073 remains not eligible for inclusion on the NRHP or CRHP, while P-37-024739 remains eligible for inclusion on the NRHP and CRHP. Therefore, resources NCD-001, NCD-002, NCD-003, NCD-004, NCD-005, NCD-006, and P-37-013073 are not Historical Resources under NHPA and CEQA, while P-37-024739 is a Historic Resource under NHPA and CEQA.

The Proposed Project includes the construction and placement of a mechanical railroad switch (i.e., turnout) to bring rail cars from the railroad mainline to the Project Site along the segment of rail that is associated with the P-37-024739 feature. The installation of the railroad switch mechanism would be added on to the existing railroad and would not result in a significant impact to the segment of railroad associated with the P-37-024739 feature as it would not result in the diminishment in the integrity of the resource.

Ground disturbance associated with this Project has the potential to impact surface and previously unknown subsurface historic resources should any be present. Impacts would be less than significant with incorporation of Mitigation Measure **CUL-1**.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

The majority of the Project Area has been geologically mapped as artificial fill that was deposited from historic-period and modern activities. A small area located in the very southeastern portion of the Project Area is mapped as young alluvial flood-plain deposits dating from the Late Pleistocene to the Holocene (0.126 – 0 Ma). Those Holocene surface sediments in the southeastern portion of the Project Area are consistent with strata that precontact archaeological deposits have been previously identified and documented in the region. Due to the presence of sediments contemporaneous with human occupation of the region and the presence of previously recorded precontact resources in the surrounding area and within the Project Area, the potential for subsurface resources in previously undisturbed soils is considered moderate. CEQA requires the Lead Agency to address any unanticipated cultural resource discoveries during Project construction. Impacts would be less than significant with incorporation of Mitigation Measures **CUL-1, CUL-2,** and **CUL-3.**

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

No formal cemeteries are located in or near the Project Area. Most Native American human remains are found in prehistoric archaeological sites. No impacts to human remains are anticipated; however, if any are encountered during Project-related ground-disturbing construction activities, existing regulations (§7050.5 of the California Health and Safety Code, §5097.98 of the California PRC, and Assembly Bill [AB] 2641) are in place that detail the actions that must be taken if such discoveries are made. Implementation of Mitigation Measure **CUL-3** would reduce impacts to a less than significant level.

4.5.4 Mitigation Measures

CUL-1: **Archaeological Monitoring.** A qualified professional archaeologist, meeting or working under the direction of someone meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric and historic archaeology should be retained to monitor all ground-disturbing activities associated with Project construction, including vegetation removal, clearing, grading, trenching, excavation, or other activities that will disturb original (pre-project) ground. The monitor must have the authority to temporarily pause activity at the location in the event of an unanticipated discovery, so that he or she can direct the procedures in section 6.3.3.

CUL-2: **Native American Monitoring.** A Native American monitor from a tribe that is traditionally and culturally affiliated with the Project Area should be retained to monitor all ground-disturbing activities associated with Project construction, including vegetation removal, clearing, grading, trenching, excavation, or other activities that will disturb original (pre-project) ground. The Native American monitor should have the authority to temporarily pause activity at the location in the event of an unanticipated discovery, so that he or she can coordinate with the Project archaeologist on the identification of a potential cultural resource and the Project archaeologist can direct the procedures in the following section.

CUL-3: **Post-Review Discovery Procedures.** If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for pre-contact and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the City, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the

CEQA Guidelines, or a Historic Property, as defined in 36 CFR 60.4. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or Section 106; or 2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the San Diego County Medical Examiner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Medical Examiner determines the remains are Native American and not the result of a crime scene, the Medical Examiner will notify the NAHC, which then will designate a Native American MLD for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

4.6 Energy

4.6.1 Environmental Setting

California relies on a regional power system comprised of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. Natural gas provides California with a majority of its electricity followed by renewables, large hydroelectric and nuclear (California Energy Commission [CEC] 2018a). San Diego Gas & Electric (SDG&E) currently provides natural gas and electricity transmission and distribution infrastructure in San Diego County. SDG&E is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California utilities' customers have safe and reliable utility service. The program's energy needs would be supplied through the various combinations of energy resources available within the program areas, and the analysis in this section takes into account the anticipated future SDG&E energy resource use patterns.

The CPUC regulates SDG&E. The CPUC has developed energy efficiency programs such as smart meters, low-income programs, distribution generation programs, self- generation incentive programs, and a California solar initiative. Additionally, the CEC maintains a power plant data base that describes all of the operating power plants in the state by County. San Diego County contains approximately 22 solar-

powered plants, three wind-powered, 30 natural gas-fired, four hydrogen fuel cells, and eight powered by the incineration of biomass (CEC 2021).

4.6.1.1 Existing Transmission and Distribution Facilities

The components of transmission and distribution systems include the generating facility, switching yards and stations, primary substation, distribution substations, distribution transformers, various sized transmission lines, and the customers. The U.S. contains over a quarter million miles of transmission lines, most of them capable of handling voltages between 115 kilovolts (kv) and 345 kv, and a handful of systems of up to 500 kv and 765 kv capacity. Transmission lines are rated according to the amount of power they can carry, the product of the current (rate of flow), and the voltage (electrical pressure). Generally, transmission is more efficient at higher voltages. Generating facilities, hydro-electric dams, and power plants usually produce electrical energy at fairly low voltages, which is increased by transformers in substations. From there, the energy proceeds through switching facilities to the transmission lines. At various points in the system, the energy is "stepped down" to lower voltages for distribution to customers. Power lines are either high voltage (115, 230, 500, and 765 kv) transmission lines or low voltage (12, 24, and 60 kv) distribution lines. Overhead transmission lines consist of the wires carrying the electrical energy (conductors), insulators, support towers, and grounded wires to protect the lines from lightning (called shield wires). Towers must meet the structural requirements of the system in several ways. They must be able to support both the electrical wires, the conductors, and the shield wires under varying weather conditions, including wind and ice loading, as well as a possible unbalanced pull caused by one or two wires breaking on one side of a tower. Every mile or so, a "dead-end" tower must be able to take the strain resulting if all the wires on one side of a tower break. Every change in direction requires a special tower design. In addition, the number of towers required per mile varies depending on the electrical standards, weather conditions, and the terrain. All towers must have appropriate foundations and be available at a fairly regular spacing along a continuous route accessible for both construction and maintenance. A ROW is a fundamental requirement for all transmission lines. A ROW must be kept clear of vegetation that could obstruct the lines or towers by falling limbs or interfering with the sag or wind sway of the overhead lines. If necessary, land acquisition and maintenance requirements can be substantial. The dimensions of a ROW depends on the voltage and number of circuits carried and the tower design. Typically, transmission line rights-of-way range from 100 to 300 feet in width.

The California Independent System Operator (CAISO) manages the flow of electricity across the high-voltage, long-distance power lines (high-voltage transmissions system) that make up 80 percent of California's and a small part of Nevada's grid. This nonprofit public benefit corporation keeps power moving to and throughout California by operating a competitive wholesale electricity market, designed to promote a broad range of resources at lower prices, and managing the reliability of the electrical transmission grid. In managing the grid, CAISO centrally dispatches generation and coordinates the movement of wholesale electricity in California. As the only independent grid operator in the western U.S., CAISO grants equal access to 26,000 circuit miles of transmission lines and coordinates competing and diverse energy resources into the grid where it is distributed to consumers. Every 5 minutes, CAISO forecasts electrical demand and dispatches the lowest cost generator to meet demand while ensuring enough transmission capacity for delivery of power.

4.6.1.2 Energy Consumption

Electricity use is measured in kilowatt-hours (kWh), and natural gas use is measured in therms. Vehicle fuel use is typically measured in gallons (e.g., of gasoline or diesel fuel), although energy use for electric vehicles is measured in kWh.

The electricity consumption associated with all non-residential uses in San Diego County from 2016 to 2020 is shown in Table 4.6-1. As indicated, the demand has decreased since 2016.

Table 4.6-1. Non-Residential Electricity Consumption in San Diego County 2016-2020

Year	Electricity Consumption (kilowatt hours)
2020	11,657,679,451
2019	12,415,797,864
2018	12,768,021,612
2017	12,614,446,916
2016	12,964,561,271

Source: CEC 2021

The natural gas consumption associated with all non-residential uses in San Diego County from 2016 to 2020 is shown in Table 4.6-2. As indicated, the demand has remained constant since 2016.

Table 4.6-2. Non-Residential Natural Gas Consumption in San Diego County 2016-2020

Year	Natural Gas Consumption (therms)
2020	259,873,628
2019	272,237,239
2018	268,588,772
2017	257,919,617
2016	259,825,086

Source: CEC 2021

Automotive fuel consumption in San Diego County from 2017 to 2021 is shown in Table 4.6-3. Fuel consumption has remained decreased between 2017 and 2021 for all on-road vehicles but has remained constant for off-road vehicles.

Table 4.6-3. Automotive Fuel Consumption in San Diego County 2017-2021

Year	Total On-road Fuel Consumption	Total Off-road Fuel Consumption
2021	1,569,307,501	18,057,890
2020	1,398,441,429	17,888,512
2019	1,592,511,108	17,662,426
2018	1,622,844,939	17,375,441

Table 4.6-3. Automotive Fuel Consumption in San Diego County 2017-2021		
Year	**Total On-road Fuel Consumption**	**Total Off-road Fuel Consumption**
2017	1,632,692,264	18,321,902

Source: CARB 2021a

4.6.2 Energy (VI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Less than Significant Impact.

The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. For the purpose of this analysis, the amount of electricity and natural gas estimated to be consumed by the Project is quantified and compared to that consumed by all non-residential land uses in San Diego County. Similarly, the amount of fuel necessary for Project construction is calculated and compared to that consumed by off-road equipment in San Diego County, and the amount of fuel necessary for Project operations is calculated and compared to that consumed by on-road vehicles in San Diego County.

The analysis of electricity and natural gas usage is based on CalEEMod modeling conducted by ECORP, which quantifies energy use for Project operations. The amount of operational automotive fuel use was estimated using the CARB's EMFAC2021 computer program, which provides projections for typical daily fuel usage in San Diego County (Appendix D). The amount of total construction-related fuel use was estimated using ratios provided in the Climate Registry's General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. Energy consumption associated with the Proposed Project is summarized in Table 4.6-4.

Table 4.6-4. Proposed Project Energy and Fuel Consumption		
Energy Type	**Annual Energy Consumption**	**Percentage Increase Countywide**
Building Energy Consumption		
Electricity Consumption	773,900 kilowatt-hours	0.006 percent
Natural Gas Consumption	3,597 therms	0.001 percent
Automotive Fuel Consumption		
Project Construction	34,975 gallons	0.193 percent
Project Operations	35,842 gallons	0.002 percent

Source: Refer to Appendix A for building energy consumption calculations and Appendix D for Fuel Consumption calculations.

Notes: The Project increases in electricity and natural gas consumption are compared with all of the non-residential buildings in San Diego County in 2020, the latest data available. The Project increases in construction and operations automotive fuel consumption are compared with the countywide fuel consumption in 2021, the most recent full year of data.

Operations of the Proposed Project would include electricity and natural gas usage from lighting, space and water heating. As shown in Table 4.6-4, the annual electricity consumption due to operations would be 773,900 kWh resulting in an imperceivable increase (0.006 percent) in the typical annual electricity consumption attributable to all non-residential uses in San Diego County. However, this is potentially a conservative estimate. In September 2018 Governor Jerry Brown Signed EO B-55-18, which established a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Carbon neutrality refers to achieving a net zero carbon dioxide (CO_2) emissions. This can be achieved by reducing or eliminating carbon emissions, balancing carbon emissions with carbon removal, or a combination of the two. This goal is in addition to existing statewide targets for GHG emission reduction. Governor's Executive Order B-55-18 requires CARB to "work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." Furthermore, the Project's increase in natural gas usage of 0.001 percent across all non-residential uses in the County would also be negligible. For these reasons, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

Fuel necessary for Project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the Project Area. The fuel expenditure necessary to construct the physical building and infrastructure would be temporary, lasting only as long as Project construction. As indicated in Table 4.6-4, the Project's gasoline fuel consumption during the one-time construction period is estimated to be 34,975 gallons. This would increase the annual construction related fuel use in the county by 0.193 percent. As such, Project construction would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently

maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these reasons, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

The Project is estimated to generate approximately 240 daily trips (KOA 2022). As indicated in Table 4.6-4, this would in the consumption of approximately 35,842 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.002 percent. This analysis conservatively assumes that all of the automobile trips projected to arrive at the Project during operations would be new to San Diego County. Further, a liberal approach was taken for vehicle trip estimation to ensure potential impacts due to operational gasoline usage were adequately accounted. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

For these reasons, this impact would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Less than Significant Impact.

The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The Project will be built to the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the CCR (Title 24). Title 24 was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years; the 2016 standards became effective January 1, 2017. The 2019 Title 24 updates went into effect on January 1, 2020. The 2019 Energy Standards improve upon the 2016 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 update to the Energy Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The 2019 Energy Standards are a major step toward meeting Zero Net Energy. Buildings permitted on or after January 1, 2020, must comply with the 2019 Standards. Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments. Additionally, in January 2010, the State of California adopted the California Green Building Standards Code (CalGreen) that establishes mandatory green building standards for all buildings in California. The code was subsequently updated in 2013. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. Additionally, the Project would comply with the City's General Plan Conservation Element Goal CS-7 which aims to lower per capita energy demands due to conservation and reduced dependence on fossil fuels through an increase in the use of alternative and renewable energy

sources. Goal CS-7 has numerous policies that directly apply to the Proposed Project. With these building standards and policies in place, the Project would not obstruct any state or local plan for renewable energy or energy efficiency.

For these reasons, this impact would be less than significant.

4.6.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.7 Geology and Soils

4.7.1 Environmental Setting

4.7.1.1 Geomorphic Setting

The Coastal Plain region of San Diego County includes most of the western portion of the County, including National City, and consists of primarily of Mesozoic crystalline rocks underlain by marine and non-marine sedimentary rocks. The local geology of the City consists primarily of Holocene and Pleistocene formations, including artificial fill, old paralic deposits, very old paralic deposits, and young alluvial deposits.

The Project Area is located within the coastal plain section of the Peninsular Ranges geomorphic province of southern California and is underlain at depth by Pleistocene-age Old Paralic Deposits (Qop_6). The surface of the Project Area is covered with Young Alluvium (Qya) associated with the Sweetwater River which flows into the bay north of the Project Area. Roughly 9 to 11 feet of undocumented fill was observed directly overlying the young alluvium.

4.7.1.2 Regional Seismicity and Fault Zones

An "active fault," according to California DOC, Division of Mines and Geology, is a fault that has indicated surface displacement within the last 11,000 years. A fault that has not shown geologic evidence of surface displacement in the last 11,000 years is considered "inactive." The California Geological Survey (CGS) does not include the City on its list of cities affected by Alquist-Priolo Earthquake Fault Zones (City of National City 2011c).

There are no active faults that run directly through National City. Sweetwater Fault runs through the far eastern edge of the City and is considered inactive. The faults located near National City include Rose Canyon Fault, La Nación Fault, Coronado Bank, San Diego Trough, and San Clemente Fault. The La Nación Fault Zone is located near National City and Chula Vista and therefore poses the greatest potential earthquake to the City, while Rose Canyon Fault poses the greatest potential threat to San Diego as a region due to its proximity to areas of high population (City of National City 2011c).

4.7.1.3 Soils

According to the U.S. Department of Agriculture (USDS) Soil Conservation Service's *Soil Survey of San Diego County*, the Project Area is composed of the soil type HuC Huerhuero-Urban land complex (two to

nine percent slopes), which has a slight soil erosion rating (City of National City 2011c). A soils analysis search was conducted using the Web Soil Survey data and two soil types occur in the biological survey area, Huerhuero-Urban land complex and Md Made land (ECORP 2022b).

A geotechnical investigation was conducted for the Project to characterize the geotechnical conditions in the Project Area based on the findings of the subsurface explorations, laboratory tests, and engineering analyses (Group Delta 2022). According to the findings, the entire Project Area is underlain at depth by Pleistocene-age Old Paralic Deposits and primarily consist of silty sandstone (SM). The Old Paralic Deposits have a relatively high shear strength and low compressibility. Alluvium was encountered in most of the explorations at depths ranging from about 10 to 20 feet below existing surface grades. The alluvial soils we observed in the borings primarily consisted of clean sands such as poorly-graded sand and well-graded sand (SP, SP-SM, and SW). Lesser amounts of silty sand and sandy silt were also observed. Roughly 9 to 11 feet of undocumented fill was observed directly overlying the young alluvium and consisted of a clayey sand with gravel and sandy lean clay (SC and CL). The deeper fill soils included sandy silt (ML). The fill contained little subangular gravel, as well as some trash and demolition debris including wood, plastic, glass, and metal fragments. Lab tests on samples of the clayey fill indicated low plasticity and a very low to low expansion potential.

4.7.1.4 Paleontological Resources

A paleontological records search was conducted for the Proposed Project to determine if paleontological resources were present in or adjacent to the Project Area and assess the sensitivity of the Project Area for undiscovered paleontological resources. The San Diego Natural History Museum (SDNHM) database results, summary, and recommendations can be found in the assessment in Appendix E. The records search results indicate that the Proposed Project has the potential to impact artificial fill and Quaternary young alluvial flood plain deposits. Artificial fill is mapped as underlying the majority of the Project Area. Because artificial fill has been previously disturbed and may have been imported to a project area, any contained fossil remains have lost their original stratigraphic contextual data and are thus of little scientific value. For these reasons, artificial fill is assigned no paleontological sensitivity. The eastern margin of the Project Area is underlain at the surface by late Pleistocene- to Holocene-age young alluvial flood plain deposits. These deposits are assigned a low paleontological sensitivity based on their relatively young geologic age and lack of recorded fossil collection localities. Additionally, SDNHM does not have any recorded fossil localities that lie within 1 mile of the Project Area.

4.7.2 Geology and Soils (VII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

i) The California Geological Survey does not include the City on its list of cities affected by Alquist Priolo Earthquake Fault Zones, and no indication of Holocene active or potentially active faulting was found during the geotechnical investigation and literature review (Group Delta 2022). No known active faults run through the City or the Project limits. CGS has determined that the active faults around the City do not present a risk of ground rupture in the event of an earthquake. In the absence of any onsite active faults, no impact related to fault-rupture would occur in the Project Area and no mitigation is required.

Less than Significant Impact.

ii) The City is located within a seismically active region and earthquakes have the potential to cause ground shaking of significant magnitude (City of National City 2011c). There is potential for strong ground motion due to a seismic event on the nearby Rose Canyon fault zone. All known active faults located within 60 miles of the Project Area are shown in Figure 5A of Report of Geotechnical Investigation (Appendix F) (Group Delta 2022). The strong ground shaking hazard may be managed by structural design per the governing edition of the California Building Code (CBC) Structures should be designed in general accordance with the seismic provisions of the CBC Seismic Design Category D to reduce the risk of loss, injury, or death resulting from strong ground-shaking to less than significant.

Less than Significant Impact.

iii) Liquefaction is a phenomenon where water-saturated granular soil loses shear strength during strong ground shaking produced by earthquakes. The loss of soil strength occurs when cyclic pore water pressure increases below the groundwater surface. Potential hazards due to liquefaction include the loss of bearing strength beneath structures, possibly causing foundation failure and/or significant settlements.

Historically, seismic shaking levels in the San Diego region, including National City, have not been sufficient enough to trigger liquefaction. National City has a low liquefaction risk; however, there are areas in the western and southern portions of the City that have a slight risk of liquefaction due to the presence of hydric soils or soils that are often saturated or characteristic of wetlands. The hydric soils found in National City include CkA Chino silt loam saline, Rm Riverwash, Tf Tidal flats, and TuB Tujunga sand. The Project Area is located at the City's western border and is within the area with the potential for soft soil types that may amplify effects of earthquakes to liquefaction. The soil types in the Project Area are Huerhuero-Urban land complex and Made land.

The granular loose to medium dense alluvial deposits in the Project Area are susceptible to liquefaction due to a strong earthquake on a nearby active fault zone. Liquefaction analyses were conducted and indicated that the total dynamic settlement will typically range from about 0.5 to 1 inch. It is estimated that the post-liquefaction differential settlement of the proposed improvements would be on the order of 0.5 inch in 40 feet (Group Delta 2022).

No Impact.

iv) According to the City's General Plan, the risk of landslides National City is relatively low, since the City is generally level with few areas of steep slopes (City of National City 2011c). The southern portion of the Project Area is relatively flat lying with gentle sheet grades that typically slope down to the northwest. Existing grades in the Project Area are highly irregular and vary from 18 feet above mean sea level (MSL) to about 5 feet MSL (Group Delta 2022). The Project Area is not located adjacent to a hillside area with unstable slopes. Accordingly, there is no potential for landslides and no impact would occur. No mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less than Significant Impact.

The soils in National City are at a limited risk of erosion (City of National City 2011c). Implementation of the Proposed Project would require ground-disturbing activities, such as trenching, that could potentially result in soil erosion or loss of topsoil. Construction of the Proposed Project would be required to comply with the Construction General Permit, either through a waiver or through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

BMPs are included as part of the SWPPP prepared for the Proposed Project and would be implemented to manage erosion and the loss of topsoil during construction-related activities (see Hydrology and Water Quality [IX.] Environmental Checklist and Discussion). Soil erosion impacts would be reduced to a less than significant impact, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

Strong ground shaking can cause settlement, lateral spreading, or subsidence by allowing sediment particles to become more tightly packed, thereby reducing pore space. Evidence of land subsidence in National City suggests that soils in the City are unlikely to subside in the future since soils in San Diego County are generally granitic and there have been no documented incidents of subsidence in the County or near National City (City of National City 2011c). The potential for a landslide, lateral spreading, liquefaction, or collapse in the Project Area is very low. The Project Area is relatively flat and does not have landslide potential. Impacts would be less than significant, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

Expansive soils generally result from specific clay minerals that have the capacity to shrink or swell in response to changes in moisture content. Soils in the National City area are susceptible to expansion and compaction; however, most soils have low shrink-swell potential (City of National City 2011c). The near surface fill soils observed during the geotechnical investigation primarily consisted of clayey sand and lean clay. These materials typically have a low expansion potential. Some moderately expansive clay may also exist in the Project Are in areas that were not explored (Group Delta 2022). Impacts would be less than significant and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

No Impact.

No septic tanks or alternative wastewater disposals systems are proposed. Additionally, Municipal Code Section 14.06.020 prohibits the installation of septic tanks or other devices for disposal of sewage in the City where there is an available sewer system within 200 feet. No impact would occur, and no mitigation is required.

Would the Project:	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?	☐	☐	☒	☐

Less than Significant.

According to the paleontological records search results, the Project Area is underlain by artificial fill and young alluvial flood plain deposits. The majority of the Project Area is artificial fill, which has been previously disturbed. Artificial fill is assigned no paleontological sensitivity. The eastern margin of the Project Area is underlain at the surface by late Pleistocene to Holocene-age young alluvial flood plain deposits. These deposits are assigned a low paleontological sensitivity based on their relatively young age and lack of recorded fossil collection localities.

Given the low or zero paleontological sensitivity of the geologic units underlying the Project Area and the lack of nearby recorded fossil collection localities, construction of the Project is unlikely to result in impacts to paleontological resources. Therefore, impacts would be less than significant and no mitigation is required.

4.7.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

Certain gases in the earth's atmosphere, classified as greenhouse gasses (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead trapped, resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a

habitable climate on earth. Without the greenhouse effect, the earth would not be able to support life as we know it.

Prominent GHGs contributing to the greenhouse effect are CO_2, methane (CH_4), and N_2O. Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Fluorinated gases include chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride; however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic factors together (Intergovernmental Panel on Climate Change [IPCC] 2014).

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH_4 traps over 25 times more heat per molecule than CO_2, and N_2O absorbs 298 times more heat per molecule than CO_2 (IPCC 2014). Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e), which weight each gas by its global warming potential. Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

Table 4.8-1 describes the primary GHGs attributed to global climate change, including their physical properties, primary sources, and contributions to the greenhouse effect.

Table 4.8-1. Summary of Greenhouse Gases

Greenhouse Gas	Description
CO_2	Carbon dioxide is a colorless, odorless gas. CO_2 is emitted in a number of ways, both naturally and through human activities. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO_2 emissions. The atmospheric lifetime of CO_2 is variable because it is so readily exchanged in the atmosphere.[1]
CH_4	Methane is a colorless, odorless gas and is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH_4 to the atmosphere. Natural sources of CH4 include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH_4 is about 12 years.[2]

Table 4.8-1. Summary of Greenhouse Gases	
Greenhouse Gas	**Description**
N_2O	Nitrous oxide is a clear, colorless gas with a slightly sweet odor. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. N_2O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years.[3]

Sources: (1) USEPA 2016a; (2) USEPA 2016b; (3) USEPA 2016c

The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; it is sufficient to say the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature or to global, local, or microclimates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

In 2021, CARB released the 2021 edition of the California GHG inventory covering calendar year 2019 emissions. In 2019, California emitted 418.2 million gross metric tons of CO_2e including from imported electricity. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2019, accounting for approximately 40 percent of total GHG emissions in the State. When emissions from extracting, refining, and moving transportation fuels in California are included, transportation is responsible for over 50 percent of statewide emissions in 2019. Continuing the downward trend from 2018, transportation emissions decreased 3.5 million metric tons of CO_2e in 2019, only being outpaced by electricity, which reduced emissions by 4.3 million metric tons of CO_2e in 2019. Emissions from the electricity sector account for 14 percent of the inventory and have shown a substantial decrease in 2019 due to increases in renewables. California's industrial sector accounts for the second largest source of the State's GHG emissions in 2019, accounting for 21 percent (CARB 2021b).

4.8.2 Greenhouse Gas Emissions (VIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Less than Significant Impact.

4.8.2.1 Construction-Related Emissions

Construction-related activities that would generate GHG emissions include on- and off-road equipment traffic. Table 4.8-2 illustrates the specific construction generated GHG emissions that would result from construction of the Project. Once construction is complete, the generation of these GHG emissions would cease.

Table 4.8-2. Construction Related Greenhouse Gas Emissions	
Description	**CO_2e Emissions (Metric Tons/Year)**
Construction	356
Total Construction Emissions	**356**
Significance Threshold	**3,000**

Sources: CalEEMod version 2020.4.0. Refer to Appendix A for Model Data Outputs

As shown in Table 4.8-2, Project construction would result in the generation of approximately 356 metric tons of CO_2e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease.

4.8.2.2 Operational Emissions

Operation of the Project would result in GHG emissions predominantly associated with motor vehicle use. Average daily vehicle trips provided by KOA (KOA 2022). Long-term operational GHG emissions attributable to the Project are identified in Table 4.8-3 below.

Table 4.8-3. Operational-Related Greenhouse Gas Emissions	
Description	**CO_2e Emissions (Metric Tons/Year)**
Area Source Emissions	0
Energy Emissions	210
Mobile Source Emissions	370
Waste Emissions	103
Water Emissions	230
Project Operations Total	**913**
Significance Threshold	*3,000*

Sources: CalEEMod.2020.4.0
Notes: Emission projections are predominantly based on CalEEMod model defaults for San Diego County. Average daily vehicle trips provided by KOA (KOA 2022).

As shown in Table 4.8-3, operational-generated emissions would total to approximately 913 metric tons of CO_2e, which would not exceed the numeric bright-line threshold of 3,000 metric tons of CO_2e annually. This significance threshold was developed based on substantial evidence that such thresholds represent quantitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA. The 3,000 metric tons of CO_2e

per year value represents less than one percent of future 2050 statewide GHG emissions target. Impacts would be less than significant and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

No Impact.

The City of National City adopted the General Plan in 2011. The Land Use and Community Character Planning Element of the General Plan contains statistics regarding existing and planned land uses. The Community Planning Element serves as the foundational guiding document regarding baseline conditions for the Climate Action Plan (CAP).

The CAP acts to support implementation of the General Plan through support for continued incremental changes to the urban land use form, providing greater transportation choices, and transforming the way energy is used and produced. Further, the CAP complements the General Plan policies to reduce GHG emissions with quantified benchmarks for success.

The Conservation and Sustainability Element of the General Plan includes goals related to reducing GHG emissions with a focus on the two largest emission sources: the built environment and vehicles. The Conservation and Sustainability Element contains numerous strategies the City aims to use to promote sustainability and conservation.

The CAP is a strategic planning document that identifies sources of GHG emissions within the City's boundaries, presents current and future emission estimates, identifies a GHG reduction target for future years, and presents policy provisions to reduce emissions. As part of the CAP the City implemented an emissions target of 15 percent reduction from 2005 levels by 2020. Per subsequent emissions inventories, the City has achieved the 2020 target. The CAP also lists current activities conducted in the City to continue to reduce emissions.

The GHG reduction strategies in the CAP builds on the inventory results. Both the existing and the projected GHG inventories in the CAP were derived based on the land use designations defined in the City General Plan. The Proposed Project is consistent with the land use designation and development density presented in the General Plan. The Project is not proposing to amend the City's General Plan and is consistent with all land use designations applied to the Project Area. Since the Project is consistent with the General Plan, it is consistent with the types, intensity, and patterns of land use envisioned for the Project Area in the General Plan, the Project would neither conflict with the land use assumptions nor exceed the population or job growth projections used by the City to develop the CAP. There would be no impact and no mitigation is required.

4.8.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

The manufacture, storage, transport, and use of hazardous materials can result in accidents or intentional acts that release toxic chemicals into the environment. Hazardous materials release can cause injuries and death, and can contaminate air, water, and soils (City of National City 2011d).

Facilities that use, manufacture, or store hazardous materials in California must comply with several state and federal regulations. The Superfund Amendments and Reauthorization Act directs businesses that handle, store, or manufacture hazardous materials in specified amounts to develop emergency repose plans and report release of toxic chemicals. It is also illegal for private individuals to dispose of hazardous materials improperly. There are facilities located around San Diego County that provide for the disposal of household hazardous waste materials. The closest residential hazardous material drop off site for National City is the South Bay Regional Household Hazardous Waste center located at 1800 Maxwell Road in Chula Vista (City of National City 2011d).

As previously identified, on May 31, 2022 DTSC filed a NOE to comply with the CEQA as part of the approval process for the IMW. DTSC determined that the IMW is exempt from CEQA under CCR Title 14, Section 15330 *Minor Actions Taken to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance*. Remediation of the BNSF property under the IMW consists of the removal of metals- and PCB-impacted soils resulting from past metals recycling operations by PSI at the northwestern portion of the site, which is leased from BNSF. Approximately 8,000 cubic yards of contaminated soil will be excavated and disposed of offsite at a permitted landfill (i.e., Copper Mountain Landfill, Arizona). Clean fill will be imported to return the Site to level grade. After completion of soil excavation and disposal activities, a land use covenant restricting future land uses to commercial/industrial uses will be recorded with the County Recorder's Office. Site development proposed under this Project will not occur until remediation activities are completed and approved by DTSC.

4.9.2 Hazards and Hazardous Materials (IX) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Less than Significant Impact.

4.9.2.1 Construction Impacts

Some hazardous materials, such as diesel fuel, would be used in the Project Area during construction. The use of such materials for the construction of the Proposed Project would not create a significant hazard to the public as the release of any construction-related spills would be prevented through the implementation of BMPs listed in the SWPPP.

4.9.2.2 Operational Impacts

The Proposed Project involves the construction of a transloading facility that will transload bio-diesel fuel and renewable diesel fuel directly from rail cars into trucks via short above ground manifold. Trucks will be loaded with either renewable diesel fuel or a combination of renewable diesel fuel and up to 20 percent bio-diesel fuel. The fuel will then be delivered via truck to local retailers within a 35-mile radius. Each truck loading spot will consist of a pump skid, controls and above ground piping between the belly of the rail cars and the bottom loading port of the truck. Each spot also provides a concrete pad and drain for the containment of potential spills which will be piped to a containment basin onsite. The rail car and truck unloading area will be equipped with a containment system capable of containing the contents of 110 percent of an entire rail car volume. In addition, an Emergency Response Plan (ERP) will be developed and implemented, to address and/or manage potential spills or emergency events onsite.

The transport of hazardous materials by truck is regulated by federal safety standards under the jurisdiction of the U.S. Department of Transportation. The terminal is expected to receive approximately 115 trucks per day coming in on West 18th Street and exiting the facility on West 19th Street and then to Cleveland and on to their retail client deliveries.

Impacts would be less than significant and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

The Project proposes to construct a transloading facility terminal to transload bio-diesel fuel and renewable diesel fuel directly from rail cars into trucks. Each truck loading spot will consist of a pump skid, controls and above ground piping between the belly of the rail cars and the bottom loading port of the truck. Each spot also provides a concrete pad and drain for the containment of potential spills that will be piped to a containment basin onsite. In addition, an ERP will be developed and implemented, to address and/or manage potential spills or emergency events onsite.

Additionally, some hazardous materials, such as diesel fuel, would be used during construction. A SWPPP listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements would be prepared for the Proposed Project. The release of any construction-related spills would be prevented through the implementation of BMPs listed in the SWPPP. Impacts would be less than significant and no mitigation is required.

Would the Project:	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?	☐	☐	☐	☒

Less than Significant Impact.

The Proposed Project is located approximately 0.4 mile west of Kimball Elementary. The school is located more than 0.25 mile from an existing or proposed school. No impact would occur and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

A search of the DTSC Hazardous Waste and Substances Site List (Cortese List) and EnviroStor online database, USEPA Enviromapper, and the State Water Resources Control Board (SWRCB) GeoTracker online database was conducted for the Proposed Project Area (DTSC 2022b and 2022c; USEPA 2022; SWRCB 2022). The searches of USEPA Enviromapper revealed five clean-up sites located in the vicinity of the Project Area, including:

- Lemon Grove Plating, Inc.
    - Location: 1400 Cleveland Avenue, National City, CA 91950
    - Site Type: Tiered Permit
    - Status: Inactive – Needs Evaluation
- Concrete Ship Yards
    - Location: National City, CA
    - Site Type: Military Evaluation
    - Status: Inactive – Needs Evaluation as of 7/20/2017
- Pacific Steel, Inc.

    - Location: 1700 Cleveland Avenue, National City, CA 91950
    - Site Type: Tiered Permit
    - Status: Active
- 1839 Cleveland Avenue
    - Location: 1839 Cleveland Avenue, National City, CA 91950
    - Site Type: Evaluation
    - Status: Refer: 1248 Local Agency as of 5/15/2000
- PCI Photo Lab
    - Location: 1001 West 19th Street, National City, CA 91950
    - Site Type: Tiered Permit
    - Status: Inactive – Needs Evaluation

Additionally, searches of SWRCB GeoTracker revealed three leaking underground storage tank (LUST) Cleanup Sites, two Military Cleanup Sites, and six Cleanup Program Sites, including:

- Naval Base San Diego (NBSD) – IR Site 9 (aka SWMU 2) – PCB Storage
    - Location: 3455 Senn Road, Room 108, San Diego, CA 92136-5084
    - Local Agency Case No.: H01447-015
    - Regional Board Case No: 16599-9
    - Site Type: Military Cleanup Site
    - Status: Completed – Case Closed as of 12/1/1997
- NBSD – SWMU 10 – PWC – Machine Storage Area
    - Location: 3455 Senn Road, Room 108, San Diego, CA 92136-5084
    - Local Agency Case No.: 400125--22
    - Regional Board Case No: 16599-SWMU 10
    - Site Type: Military Cleanup Site
    - Status: Completed – Case Closed as of 3/9/1995
- G & S Engineering
    - Location: 1200 Harbor Drive, National City, CA 91950
    - Local Agency Case No.: H39643-001
    - Site Type: LUST Cleanup Site
    - Status: Completed – Case Closed as of 3/15/2012
- Lemon Grove Plating
    - Location: 1400 Cleveland Avenue, National City, CA 91950
    - Local Agency Case No.: H02387-001
    - Site Type: Cleanup Program Site
    - Status: Completed – Case Closed as of 8/1/2013
- HMM Ventures
    - Location: 900 Civic Center Drive, National City, CA 91950
    - Local Agency Case No.: DEH2020-LSAM-000639
    - Site Type: Cleanup Program Site
    - Status: Completed – Case Closed as of 9/17/2021
- Tidelands Industrial Park
    - Location: 0 Tidelands Avenue, National City, CA 91950

    - Local Agency Case No.: H39776-001
    - Site Type: Cleanup Program Site
    - Status: Completed – Case Closed as of 8/15/2012
- Tidelands Industrial Park
    - Location: 0 Tidelands Avenue, National City, CA 91950
    - Local Agency Case No.: H39776-002
    - Site Type: LUST Cleanup Site
    - Status: Completed – Case Closed as of 7/16/2012
- Pacific Steel Inc
    - Location: 1700 Cleveland Avenue, National City, CA 91950
    - DTSC Case No.: 71003729
    - Local Agency Case No.: H10744-001
    - Regional Board Case No: 2093200
    - Site Type: Cleanup Program Site
    - Status: Open – Site Assessment as of 3/15/1998
- Pacific Steel Inc
    - Location: 1700 Cleveland Avenue, National City, CA 91950-4215
    - Local Agency Case No.: H10744-003
    - Site Type: Cleanup Program Site
    - Status: Open – Site Assessment as of 2/16/2000
- Cal-Doran Metallurgical SVCS
    - Location: 1804 Cleveland Avenue, National City, CA 91950-5413
    - Local Agency Case No.: H08329-001
    - Regional Board Case No: 9UT3947
    - Site Type: LUST Cleanup Site
    - Status: Completed – Case Closed as of 12/10/2010
- Costco Wholesale Packaging
    - Location: 1001 West 19th Street, National City, CA 91950-5409
    - Local Agency Case No.: H20605-001
    - Site Type: Cleanup Program Site
    - Status: Completed – Case Closed as of 4/7/1987

A majority of the previously described clean-up sites are located in areas adjacent to the Project Area and are not within the Project Area and have been remediated and closed under the direction and oversight of the San Diego RWQCB (Region 9). The only clean-up site located in the Project Area, is the Pacific Steel, Inc. site, located at 1700 Cleveland Avenue. The site status is still open as of the year 2000 and the company still has an active tiered permit, as described above. As part of a separate project, DTSC will complete the remediation of the area behind 1700 Cleveland Avenue before construction of the transloading facility for this Project begins; therefore, impacts would be less than significant. No mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 for people residing or working in the project area?	☐	☐	☐	☒

No Impact.

Although no airports are located within the City's planning area, there are three airports located near National City: the San Diego International Airport at Lindbergh Field, the Naval Air Station (NAS) North Island located in Coronado, and Brown Field Municipal Airport located south of the planning area in the Otay Mesa community. The Project Area is located approximately 5.2 miles southeast of NAS North Island and is located outside of the designated safety zones and referral zones for the airport (Ricondo & Associates, Inc. 2020). The Proposed Project is not located within an airport land use plan and would not include the construction of habitable structures. As such, the Proposed Project would not result in a safety hazard for people residing or working in the Project area. No impact would occur and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Less than Significant Impact.

The Safety Element of the City of National City notes under Policy S-5.2 to consult with San Diego County, the U.S. Navy, and other appropriate agencies regarding disaster preparedness planning, to establish evacuation routes for all types of emergencies, and to ensure the health and safety of residents during an emergency (City of National City 2011d). Primary evacuation routes for the County of San Diego include major interstates, highways, and prime arterials, such as I-5, which is located to the east of the Project Area (San Diego County 2018). The I-5 N ramp on Civic Center Drive, located approximately 0.4 miles away from the Project Area can be accessed via Cleveland Avenue. The I-5 S ramp on Bay Marina Drive, located approximately 0.36 miles from the Project Area can be accessed via Cleveland Avenue. Implementation of the Proposed Project would require construction to occur between the existing buildings along Cleveland Avenue and the existing BNSF Railway tracks and between Civic Center Drive and West 19th Street. According to Project Area plans, the terminal is expected to receive approximately 115 trucks per day coming in on West 18th Street and exiting the facility on West 19th Street and then to Cleveland Avenue and on to their retail client deliveries. Construction staging will be contained to the

Project Area and passage along roadways will be maintained during construction. Impacts to emergency access would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

No Impact.

The Proposed Project is located in a developed, industrial area of the City of National City; there are no wildlands in the vicinity. Additionally, the Proposed Project is not located on land designated as a state or local fire hazard severity zone (California Department of Forestry and Fire Protection [CAL FIRE] 2022). No impact would occur and no mitigation is required.

4.9.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 Regional Hydrology

The Project Area appears in the San Diego Bay watershed which is a part of the larger San Diego watershed. Groundwater within the City's planning area occurs primarily in two aquifers composed of alluvial deposits, the Lower and Middle Sweetwater Basins, and in the San Diego Formation, an aquifer comprised of consolidated sediment (City of National City 2011e).

4.10.1.2 Site Hydrology and Onsite Drainage

Topography for this site is generally flat, and it has been developed since at least 1904. The southern portion of the Project Area is relatively flat lying with gentle sheet grades that typically slope down to the northwest. The Project Area appears in the San Diego Bay watershed (HUC 12 # 180703041202), which is a part of the larger San Diego watershed (HUC 8 # 18070304). Although the site does not contain any streams or lead directly to any TNW, the site is approximately 550 meters from the Pacific Ocean.

Two brow-ditches functioning as stormwater conveyance systems were identified in the Project Area during the aquatic resources delineation. The features daylight within the Project Area but enter and exit culverts underground.

There are three manufactured drainage culverts that generally serve the purpose of conveying stormwater and urban runoff underneath local roads, the railroad, and surrounding developed areas. These consist mostly of concrete features with metal drainage pipes that range from one to two feet in diameter. They

are largely unvegetated and lack a natural bed and bank. These features are likely associated with municipal storm sewer systems (ECORP 2022c).

4.10.2 Hydrology and Water Quality (X) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

Less than Significant Impact.

The City of National City is a co-permittee for San Diego County under San Diego RWQCB Order Number R9-2015-0100, an order amending Order Number R9-2013-0001, NPDES Permit No. CAS010266, as amended by Order Number R9-2015-0001 also known as the Municipal Separate Storm Sewer System or MS4 permit. Water Quality Control Plan for the San Diego Basin (Basin Plan) was developed for water quality management and control for the San Diego Region. Pursuant to the requirements of the NPDES permit, all development projects are required to implement source control BMPs that will minimize the generation of pollutants. Provision E.3.c.(2)(a) of the Basin Plan requires that post-project runoff conditions mimic the predevelopment runoff conditions, and not the pre-project runoff conditions.

The focus of a construction SWPPP is to manage soil disturbance, non-storm water discharges, construction materials, and construction wastes during the construction phase of a Project. Potential water quality impacts associated with the Proposed Project include short-term, construction-related erosion/sedimentation from ground-disturbing activities and construction-related hazardous material discharge. Since the SWPPP is specifically prepared to manage storm water quality and quantity, and prevent discharge of polluted runoff from the site, adherence to mandated SWPPP requirements would ensure potential impacts that could cause a violation of any water quality standards or waste discharge requirements is less than significant. No mitigation would be required.

Would the Project:	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?	☐	☐	☐	☒

No Impact.

Sweetwater Authority pumps groundwater from the San Diego Formation and the Sweetwater Alluvium, which lie within the Sweetwater Valley groundwater basin. Through its wells in National City, the Authority obtains fresh water from the San Diego Formation. The Authority extracts brackish water from both the

alluvium of the Sweetwater River and from the San Diego Formation and treats it at the Reynolds Groundwater Desalination Facility in Chula Vista (City of National City 2011f).

Generally, in the San Diego Region, alluvial aquifers, which can be quickly recharged by stormwater or urban runoff, provide much of the current groundwater production capacity (City of National City 2011e). Due to the highly developed nature of the City, groundwater recharge areas are limited. The largest areas for groundwater recharge in the City are the Sweetwater River, Paradise Creek, Las Palmas Creek, Paradise Marsh, Bannister Marsh, National City Golf Course, Las Palmas Park, Kimball Park, El Toyon Park, Paradise Creek Park, Pepper Park, Sweetwater Heights Park, school playgrounds, recreational fields, and utility easements (City of National City 2011f).

The Proposed Project does not include withdrawal of groundwater and the Project Area is not identified as a groundwater recharge area. No impacts to groundwater supplies or recharge are anticipated and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 that 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 offsite;	☐	☐	☐	☒
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) impede or redirect flood flows?	☐	☐	☐	☒

Less than Significant Impact.

i) Construction of the Proposed Project would require ground disturbing activities, including excavation, trenching, and paving. These activities have the potential to result in erosion or siltation on- or off-site. Construction impacts would be less than significant with the implementation of standard construction BMPs.

No Impact.

ii) The southern portion of the Project Area is relatively flat, with gentle sheet grades that typically slope down to the northwest. Existing surface elevations range from about 18 feet above MSL to about 5 feet MSL. According to the geotechnical investigation, the ground surface should be graded so that water flows rapidly away from the structure and top of slope without ponding. Planters should be built so that water will not seep into the foundation, slab, or pavement areas and if roof drains are used, the drainage should be channeled by pipe to storm drains or discharge at least 10 feet from buildings (Group Delta 2022). There are two brow-ditches and three culverts in the Project Area that function as stormwater conveyance systems. The culverts convey stormwater and urban runoff underneath local roads, the railroad, and surrounding developed areas and are likely associated with municipal storm sewer systems (ECORP 2022c). A SWPPP listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements would be prepared for the Proposed Project. As such, no changes to the volume of runoff from the Project Area are anticipated as a result of the Proposed Project. No impact would occur, and no mitigation is required.

No Impact.

iii) The City has implemented the Jurisdictional Runoff Management Plan (JRMP) to improve water quality in the City's creeks, rivers, and oceans through reducing discharges of pollutants to the municipal storm sewer system. The City is subject to a NPDES MS4 Permit by the RWQCB, San Diego Region, which requires the City to reduce pollutants in discharges from its storm drain system to water bodies (City of National City 2020). There are two brow-ditches and three culverts in the Project Area that function as stormwater conveyance systems. The culverts convey stormwater and urban runoff underneath local roads, the railroad, and surrounding developed areas and are likely associated with municipal storm sewer systems (ECORP 2022c). A SWPPP listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements would be prepared for the Proposed Project. The Proposed Project is not anticipated to change the quality and quantity of runoff water in the Project Area. No impact would occur, and no mitigation is required.

No Impact.

iv) As previously mentioned, drainage will be to the brow-ditches and culverts in the Project Area. Surface grades of the Project Area vary from about 5 to 18 feet above MSL and it is not located within a flood hazard area (Federal Emergency Management Agency [FEMA] 2022). Construction of the transloading facility and associated improvements would not increase the rate or amount of surface runoff in a manner that would substantially increase the risk of flooding, locally impede flow, or transfer flood risk to downstream areas. No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

No Impact.

The Project Area is located in close proximity to the San Diego Bay, with surface grades that vary from about 5 to 18 feet above MSL. The relatively close proximity to the bay suggests that the potential may exist for flooding in the event that an earthquake induced tsunami or seiche were to impact the San Diego Bay, however, the existence of the offshore barrier islands and the configuration of the continental shelf in the San Diego vicinity have historically provided relief from tsunamis (Group Delta 2022). The Project Area is not located below any confined bodies of water and is not within a flood hazard area (FEMA 2022). No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

No Impact.

A Water Quality Control Plan for the San Diego Basin (Basin Plan) was developed by the California Regional Water Quality Control Board for water quality management and control for the San Diego Region. The Basin Plan establishes numeric and narrative water quality objectives to protect designated beneficial uses of inland surface waters and coastal waters (National City 2011e). Pursuant to the requirements of the NPDES permit, all development projects are required to implement source control BMPs that will minimize the generation of pollutants.

Potential water quality impacts associated with the Proposed Project include short-term construction-related erosion/sedimentation from ground-disturbing activities and construction-related hazardous material discharge. Impacts associated with construction-related water quality impacts would be avoided or reduced to a level below significance through implementation of standard construction BMPs. No conflict with a water quality control plan or sustainable groundwater management plan would occur. No mitigation is required.

4.10.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The City is comprised of three main communities, identified by major parks: El Toyon, Kimball, and Las Palmas. These communities are further divided into residential neighborhoods and business districts with distinct identities. Industrial uses in the City (10.3 percent, or 640.1 acres) includes a combination of light and heavy industrial uses, which are concentrated within the western portion of the National City by the harbor front. The Proposed Project is located in an urban developed area characterized by industrial land uses. The Project Area includes vacant land and land used for a commercial business.

4.11.2 Land Use and Planning (XI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒

No Impact.

The Proposed Project consists of construction of a transloading facility within the BNSF Railway ROW. Due to the nature of the Proposed Project, it would not physically divide an established community and no impact would occur. No mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Proposed Project consists of construction within the BNSF Railway ROW; as such, it would not conflict with any applicable land use plans or policies; and no impact would occur. No mitigation is required.

4.11.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.12 Mineral Resources

4.12.1 Environmental Setting

The State Mining and Geology Board establishes Mineral Resource Zone (MRZ) designations that quantify the mineral resource potential for specific locations across California. According to these designations, the City is located in MRZ-3 zones. The MRZ-3 Mineral Resource Zone is defined as an area where the significance of mineral deposits cannot be determined from the available data (City of National City 2011c).

4.12.2 Mineral Resources (XII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

No Impact.

The Project Area is located in MRZ-3, which is defined as an area where the significance of mineral deposits cannot be determined from the available data. The Proposed Project is located in an urban developed area characterized by industrial land uses. The Project Area includes vacant land and land used for a commercial business. The Project Area is not located on a known important mineral resource recovery site. No impacts are anticipated, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

According to the Comprehensive Land Use Update Draft EIR, the City contains a limited amount of land suitable for the extraction of mineral resources. A southern, noncontiguous area of National City located within the South San Diego Bay Unit of the San Diego National Wildlife Refuge contains salt ponds. The operation, which occurs at the southernmost end of San Diego Bay, has produced salt at this site for more than 130 years. No mining activities currently exist in the Project Area and it is not zoned or available for mining. The Proposed Project is located in an urban developed area characterized by industrial land uses. Therefore, no impact to locally important mineral resources would occur, and no mitigation is required.

4.12.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.13 Noise

4.13.1 Environmental Setting

4.13.1.1 Noise Fundamentals

Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include the average hourly noise level (in L_{eq}) and the average daily noise levels/community noise equivalent level (in L_{dn}/CNEL). The L_{eq} is a measure of ambient noise, while the L_{dn} and CNEL are measures of community noise. Each is applicable to this analysis and defined as follows:

- **Equivalent Noise Level (L_{eq})** is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **Day-Night Average (L_{dn})** is a 24-hour average L_{eq} with a 10-dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
- **Community Noise Equivalent Level (CNEL)** is a 24-hour average L_{eq} with a 5-dBA weighting during the hours of 7:00 p.m. to 10:00 p.m. and a 10-dBA weighting added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations.

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 decibels (dB) for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (Federal Highway Administration [FHWA] 2011). Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed (FHWA 2011).

The manner in which older structures in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (Caltrans 2002). The exterior-

to-interior reduction of newer structures is generally 30 dBA or more (Harris Miller Miller & Hanson Inc. [HMMH] 2006).

4.13.1.2 Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60- to 70-dBA range, and high, above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1.0 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A change in level of at least 5.0 dBA is required before any noticeable change in community response would be expected. An increase of 5.0 dBA is typically considered substantial.
- A 10.0-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

4.13.1.3 Noise Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as hospitals, historic sites, cemeteries, and certain recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest existing noise-sensitive land use to the Project Area are residents located in McKinley Apartments located approximately 530 feet east of the Project Area boundary.

4.13.1.4 Vibration Fundamentals

Ground vibration can be measured several ways to quantify the amplitude of vibration produced, including through peak particle velocity (PPV) or root mean square velocity. These velocity measurements measure maximum particle at one point or the average of the squared amplitude of the signal, respectively.

Vibration impacts on people can be described as the level of annoyance and can vary depending on an individual's sensitivity. Generally, low-level vibrations may cause window rattling but do not pose any threats to the integrity of buildings or structures.

4.13.1.5 Existing Ambient Noise Environment

The most common and significant source of noise in the National City is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, industrial, and commercial) that generate stationary-source noise. The Project Area is bound by a remediation area to the north, industrial uses to the east, West 19th Street and industrial uses to the south and the BNSF Railway railroad to the west. The most significant noise in the Project Area is generated by the BNSF railroad.

The American National Standards Institute (ANSI) Standard 12.9-2013/Part 3 "Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-Term Measurements with an Observer Present" provides a table of approximate background sound levels in CNEL, daytime L_{eq}, and nighttime L_{eq}, based on land use and population density. The ANSI standard estimation divides land uses into six distinct categories. Descriptions of these land use categories, along with the typical daytime and nighttime levels, are provided in Table 4.13-1. At times, one could reasonably expect the occurrence of periods that are both louder and quieter than the levels listed in the table. ANSI notes, *95% prediction interval [confidence interval] is on the order of +/- 10 dB*. The majority of the area surrounding the Project Area consists of industrial land uses and the BNSF Railway railroad. Thus, the Project vicinity would be considered ambient noise Category 1 and generally experiences noise levels of 67 dBA CNEL.

Table 4.13-1. ANSI Standard 12.9-2013/Part 3 A-Weighted Sound Levels Corresponding to Land Use and Population Density

Category	Land Use	Description	People per Square Mile	Typical CNEL	Daytime L_{eq}	Nighttime L_{eq}
1	Noisy Commercial & Industrial Areas and Very Noisy Residential Areas	Very heavy traffic conditions, such as in busy, downtown commercial areas; at intersections for mass transportation or for other vehicles, including elevated trains, heavy motor trucks, and other heavy traffic; and at street corners	63,840	67 dBA	66 dBA	58 dBA

Table 4.13-1. ANSI Standard 12.9-2013/Part 3 A-Weighted Sound Levels Corresponding to Land Use and Population Density

		where many motor buses and heavy trucks accelerate.				
2	Moderate Commercial & Industrial Areas and Noisy Residential Areas	Heavy traffic areas with conditions similar to Category 1, but with somewhat less traffic; routes of relatively heavy or fast automobile traffic, but where heavy truck traffic is not extremely dense.	20,000	62 dBA	61 dBA	54 dBA
3	Quiet Commercial, Industrial Areas and Normal Urban & Noisy Suburban Residential Areas	Light traffic conditions where no mass transportation vehicles and relatively few automobiles and trucks pass, and where these vehicles generally travel at moderate speeds; residential areas and commercial streets, and intersections, with little traffic compose this category.	6,384	57 dBA	55 dBA	49 dBA
4	Quiet Urban & Normal Suburban Residential Areas	These areas are similar to Category 3, but for this group, the background is either distant traffic or is unidentifiable; typically, the population density is one-third the density of Category 3.	2,000	52 dBA	50 dBA	44 dBA
5	Quiet Residential Areas	These areas are isolated, far from significant sources of sound, and may be situated in shielded areas, such as a small, wooded valley.	638	47 dBA	45 dBA	39 dBA
6	Very Quiet Sparse Suburban or rural Residential Areas	These areas are similar to Category 4 but are usually in sparse suburban or rural areas; and, for this group, there are few if any nearby sources of sound.	200	42 dBA	40 dBA	34 dBA

Source: ANSI 2013

4.13.2 Noise (XIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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 Impact

4.13.2.1 Project Onsite Construction Noise

Construction noise associated with the Proposed Project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, building construction, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

The City's regulations with respect to construction noise are included in Title 12 of the City's Municipal Code. More specifically, Section 12.10.160 states that construction is prohibited on weekdays between the hours of 7:00 p.m. and 7:00 a.m., or at any time on weekends or holidays. Additionally, mobile construction equipment in Type 1, residential areas, shall not exceed 75 dBA and stationary equipment shall not exceed 60 dBA. As previously described, the Project Area is located in an area surrounded mainly by industrial land uses. The nearest noise-sensitive land use to the Project Area are residents located in McKinley Apartments located approximately 530 feet east of the Project Area boundary.

It is acknowledged that the majority of construction equipment is not situated at any one location during construction activities, but rather spread throughout the Project Area and at various distances from sensitive receptors. Therefore, this analysis employs the Federal Transit Administration (FTA) guidance for calculating construction noise, which recommends measuring construction noise produced by all construction equipment simultaneously from the center of the Project Area (FTA 2018), which in this case is approximately 640 feet from the nearest sensitive receptor. The anticipated short-term construction noise levels generated for the necessary equipment during each phase are summarized in Table 4.13-2.

Table 4.13-2. Construction Average (dBA) Noise Levels at Nearest Receptor – Project Area			
Equipment	**Estimated Exterior Construction Noise Level at Nearest Residences**	**Construction Noise Standards (dBA L_{eq})**	**Exceeds Standards?**
Site Preparation – Mobile Equipment			
Excavators (2)	54.6 (each)	*75*	**No**
Off-Highway Trucks (1)	48.1	*75*	**No**
Rollers (1)	50.9	*75*	**No**
Rough Terrain Forklifts (2)	57.3 (each)	*75*	**No**
Skid Street Loaders (1)	53.0	*75*	**No**
Tractor/Loader/Backhoe (1)	57.9	*75*	**No**
Trenchers (1)	51.5	*75*	**No**
Combined Site Preparation Mobile Equipment	**64.4**	*75*	**No**
Grading – Mobile Equipment			
Excavators (1)	54.6	*75*	**No**
Off-Highway Trucks (1)	48.1	*75*	**No**
Other Equipment (1)	59.8	*75*	**No**
Rollers (1)	50.9	*75*	**No**
Rough Terrain Forklifts (1)	57.3	*75*	**No**
Skid Street Loaders (1)	53.0	*75*	**No**
Tractor/Loader/Backhoe (1)	57.9	*75*	**No**
Trenchers (1)	51.5	*75*	**No**
Combined Grading Mobile Equipment	**64.7**	*75*	**No**
Building Construction, Paving and Painting – Mobile Equipment			
Excavators (1)	54.6	*75*	**No**
Other Equipment (1)	59.8	*75*	**No**
Rollers (1)	50.9	*75*	**No**
Rough Terrain Forklifts (3)	57.3 (each)	*75*	**No**
Skid Street Loaders (3)	53.0 (each)	*75*	**No**

Table 4.13-2. Construction Average (dBA) Noise Levels at Nearest Receptor – Project Area			
Equipment	**Estimated Exterior Construction Noise Level at Nearest Residences**	**Construction Noise Standards (dBA L_{eq})**	**Exceeds Standards?**
Off-Highway Trucks (2)	48.1 (each)	*75*	**No**
Combined Mobile Building Construction, Paving and Painting Mobile Equipment	**65.7**	*75*	**No**

Source: Construction noise levels were calculated by ECORP using the FHWA Roadway Noise Construction Model (FHWA 2006). Refer to Appendix G for Model Data Outputs.

Notes: Construction equipment used during construction provided by the Project proponent. It is noted that no stationary equipment would be used during construction activities.

L_{eq} = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

As shown in Table 4.13-2, during construction activities no individual or cumulative pieces of mobile construction equipment would exceed the City's threshold of 75 dBA at the nearest noise-sensitive land use.

4.13.2.2 Offsite Construction Worker Traffic Noise

Project construction would result in additional traffic on adjacent roadways over the period that construction occurs. According to the CalEEMod model, which is used to predict the number of worker commute trips, the maximum number of construction workers traveling to and from the Project Area during a single construction phase would not be expected to exceed 381 trips in total (184 construction worker trips, 125 haul truck trips, and 72 vendor trips). It is noted that haul truck trips were distributed over 120 days, the total days for grading and building construction.

According to Caltrans' *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference) (Caltrans 2013). The Project Area is accessible from West 18th Street via Cleveland Avenue. According to the City's General Plan Update Background Report, the roadway segment on Cleveland Avenue from Civic Center Drive to West 19th Street, which traverses the Project Area, has an average daily traffic county of 3,600 vehicles. Thus, Project construction would not result in a doubling of traffic, and therefore its contribution to existing traffic noise would not be perceptible. Additionally, it is noted that construction is temporary, and these trips would cease upon completion of the Project.

4.13.2.3 Operational Onsite Stationary Noise

The Project Area is located in a heavily developed industrial area and is located adjacent to the BNSF Railway railroad which is one of the largest freight railroads in North America. The Project is proposing to construct a transloading facility within the railroad ROW located between the existing buildings along Cleveland Avenue and the existing railway tracks. Potential stationary noise sources related to long-term

operation on the Project Area would include railway activity, internal circulation of heavy-duty trucks and the unloading of the rail cars. The most basic planning strategy to minimize adverse impacts on new land uses due to noise is to avoid designating certain land uses at locations within the community that would negatively affect noise sensitive land uses. As previously described, the Project is proposing a transloading facility on an active rail network within a heavily developed industrial area. The Project is consistent with the types, intensity, and patterns of land use envisioned for the Project Area. Operation of the Project would not contribute any noise sources beyond what is currently experienced in the Project Area and would not result in a significant noise-related impact associated with onsite sources.

4.13.2.4 Operational Offsite Traffic Noise

Project operations would also result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the Project vicinity. The Project Area would be accessible from West 18th Street via Cleveland Avenue. According to the City's General Plan Update Background Report, the roadway segment on Cleveland Avenue from Civic Center Drive to West 19th Street, which traverses the Project Area, has an average daily traffic county of 3,600 vehicles. Per the *Transload Facility 18th Street and Cleveland Avenue Traffic Impact Study* the Project would generate 240 daily trips (KOA 2022). According to the Caltrans *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, doubling of traffic on a roadway would result in an increase of 3 dB (a barely perceptible increase) (Caltrans 2013). The Project would not result in a doubling of traffic, thus its contribution to existing traffic noise would not be perceptible.

Impacts would be less than significant and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Less Than Significant Impact

4.13.2.5 Project Construction

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term, construction-related activities. Construction on the Project Area would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is noted that pile drivers would not be necessary during Project construction. Vibration decreases rapidly with distance and it is acknowledged that construction activities would occur throughout the

Project Area and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment at 25 feet distant are summarized in Table 4.13-3.

Table 4.13-3. Representative Vibration Source Levels for Construction Equipment

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source: FTA 2018; Caltrans 2020

The City does not regulate vibrations associated with construction. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the Caltrans recommended standard of 0.2 inches per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold (Caltrans 2020). This is also the level at which vibrations may begin to annoy people in buildings. Consistent with FTA recommendations for calculating vibration generated from construction equipment, construction vibration was measured from the center of the Project Area (FTA 2018). The nearest structure of concern to the construction site is Honor Marine Electronics located approximately 175 feet east of the Project Area center.

Based on the representative vibration levels presented for various construction equipment types in Table 4.13-3 and the construction vibration assessment methodology published by the FTA (2018), it is possible to estimate the potential Project construction vibration levels. The FTA provides the following equation:

$$[PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}].$$

Table 4.13-4 presents the expected Project related vibration levels at a distance of 175 feet.

Table 4.13-4. Onsite Construction Vibration Levels at 175 Feet							
Receiver PPV Levels (in/sec)[1]					Peak Vibration	Threshold	Exceed Threshold
Large Bulldozer, Caisson Drilling & Hoe Ram	Loaded Trucks	Jackhammer	Small Bulldozer	Vibratory Roller			
0.0048	0.0041	0.0018	0.0001	0.0113	**0.0113**	*0.2*	**No**

Notes: [1]Based on the Vibration Source Levels of Construction Equipment included on Table 4.13-3 (FTA 2018). Distance to the nearest structure of concern is approximately 175 feet measured from Project Area center.

As shown in Table 4.13-4, vibration as a result of onsite construction activities on the Project Area would not exceed 0.2 PPV at the nearest structure. Thus, onsite Project construction would not exceed the recommended threshold.

4.13.2.6 Project Operations

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. While the Project would accommodate heavy-duty trucks, these vehicles can only generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances. Therefore, the Project would result in negligible groundborne vibration impacts during operations.

Impacts would be less than significant and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project Area is located approximately 5.8 miles northwest of the San Diego International Airport. According to the National City General Plan Noise Element the Project Area is located outside of the Airport Noise Impact Area per Figure NN-2. Thus, the Proposed Project would not expose people working in the Project Area to excess airport noise levels. No impact would occur.

4.13.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.14 Population and Housing

4.14.1 Environmental Setting

The City of National City is a centrally located community in the San Diego South Bay that is home to an estimated 61,121 residents as of 2019. In a span of five years from 2015 to 2019, National City's population increased by approximately 1.8 percent. The growth in population will drive job growth and housing demand within the San Diego region, adding nearly 500,000 jobs and more than 330,000 housing units by 2050. National City faces the challenges of high regional housing costs, relatively low household incomes, and accommodating its share of the regional housing need given the limited availability of undeveloped, vacant land in a highly developed urban setting (City of National City 2021a).

4.14.2 Population and Housing (XIV) Environmental Checklist and Discussion

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

No Impact.

The City's General Plan estimates a growth in the City's population and job growth by 2050. The Proposed Project will employ a total of 12 full-time employees at the terminal, with up to 6 employees onsite at any given time. The Project will not induce substantial unplanned growth in the area. No impact would occur and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact.

The Proposed Project will construct a transloading facility on the BNSF Railway railroad ROW. The Project is located in a primarily industrial area and will not displace substantial numbers of people or existing housing. Therefore, there is no impact and no mitigation is required.

4.14.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 Police Services

The National City Police Department employs 92 police officer and 43 professional staff members. The police station is located at 1200 National City Boulevard, approximately 0.52 mile east of the Project Area (City of National City 2022a).

4.15.1.2 Fire Services

The National City Fire Department serves an area of approximately 9 square miles and 63,000 residents, while also protecting the Lower Sweetwater Fire Protection District, the Port of San Diego, and Navy Base San Diego. The Fire Department is made up of three divisions: Fire Administration, Fire Prevention, and Fire Operations (City of National City 2022b).

The Fire Operations Division oversees 39 full-time sworn personnel who respond to fires, emergency medical calls, rescues, hazardous incidents, and all other emergency and non-emergency calls for service from three fire stations that are staffed 24-hours a day, 7 days a week. The nearest fire station is Fire Operations Station #34, which is located at 343 East 16th Street, approximately 0.75 acre east of the Project Area (City of National City 2022b).

4.15.1.3 Schools

The National School District is comprised of 10 public schools offering grades K through 6 as well as extended programming and summer camps. Sweetwater Union High School District has four campuses in National City, offering instruction primarily in grades 7 through 12. In addition, National City Middle and Granger Junior High offer secondary instruction and National City Adult offers high school equivalency and continuing education (City of National City 2022c).

4.15.1.4 Parks

National City has five public parks under its jurisdiction (City of National City 2022d). There are approximately 119 acres of parkland (excluding the golf course) located within the City limits. There are currently no joint-use agreements in effect between National City and National School District to share school facilities, playfields, or parking spaces (City of National City 2011b). The nearest park, Kimball Park, is located approximately 0.57 acre east of the Project Area.

4.15.1.5 Other Public Facilities

Other public facilities and services provided within the City include library services. Library services are provided by the National City Public Library, located at 1401 National City Boulevard, approximately 0.55 mile east of the Project Area.

4.15.2 Public Services (XV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☒	☐

4.15.2.1 Fire Protection

Less than Significant Impact.

The City of National City may charge an Emergency Response Cost Recovery Fee to recover the reasonable costs of services necessary to protect the public health and safety associated with motor vehicle incidents, hazardous materials spills or discharges, motor vehicle fires, motor vehicle extrications, pipeline or power line incidents, and fire cause and origin investigations. The City shall charge fees for the cost of services that the National City Fire Department provides related to emergency responses, such as hazardous materials spills or discharges. Fees for HAZMAT services range from $700 for basic response to $5,900 for advance responses (National City, California, Municipal Code § 4.70). The Project components include truck loading spots that provide a concrete pad and drain for the containment of potential spills which would be piped to a containment basin onsite. The rail car and truck unloading area will be equipped with a containment system capable of containing the contents of 110 percent of an entire rail car volume. In addition, an ERP will be developed and implemented, to address and/or manage potential spills or emergency events onsite. Impacts would be less than significant and no mitigation is required.

4.15.2.2 Police Services

Less than Significant Impact.

The Proposed Project would employ a total of 12 employees will work onsite, with a schedule of three people per shift on three 8-hour shifts. The nature of the Proposed Project would not substantially increase permanent population growth nor create substantial additional demand for police services.

4.15.2.3 Schools

Less than Significant Impact.

The nature of the Proposed Project would not substantially increase permanent population growth or create substantial additional demand for school services. School fees are not applicable to this Project, as they are only required prior to the issuance of building permits for any new dwelling unit in the City (National City, California, Municipal Code § 4.34.140). Impacts would be less than significant, and no mitigation is required.

4.15.2.4 Parks

Less than Significant Impact.

The Proposed Project would employ a total of 12 employees will work onsite, with a schedule of three people per shift on three 8-hour shifts. The Project would not create a substantial increase in employees or new residents that would increase park use to the extent that modifications to existing parks or construction of new park facilities are required. Impacts would be less than significant, and no mitigation is required.

4.15.2.5 Other Public Facilities

Less than Significant Impact.

Implementation of the Proposed Project does not include residential development and will not substantially increase the local population. A total of 12 employees will work onsite, with a schedule of three people per shift on three 8-hour shifts. Project implementation would not require construction of new or expansion of existing public facilities, such as the local library. Impacts would be less than significant, and no mitigation is required.

4.15.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.16 Recreation

4.16.1 Environmental Setting

National City has five public parks under its jurisdiction (City of National City 2022d). There are approximately 119 acres of parkland (excluding the golf course) located within the City limits. There are

currently no joint-use agreements in effect between National City and National School District to share school facilities, playfields, or parking spaces (City of National City 2011b). The nearest park, Kimball Park, is located approximately 0.57 acre east of the Project Area.

The City also operates and maintains several non-park recreational facilities. Indoor recreational opportunities include after school youth programs, senior activities, and a community center with events for all ages (City of National City 2011b).

4.16.2 Recreation (XVI) Materials Checklist

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

Less than Significant Impact.

The Project would employ a total of 12 employees onsite with three people scheduled per shift on three 8-hour shifts. The Proposed Project would not create a substantial increase in new residents that would increase park use to the extent that substantial physical deterioration of the facility would occur. The closest park to the Proposed Project is Kimball Park, located approximately 0.57 acre east. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) 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 would construct a transloading facility and would not affect recreational facilities. As such, the Proposed Project would not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. No impact would occur, and no mitigation is required.

4.16.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.17 Transportation

4.17.1 Environmental Setting

The City of National City's dense and compact urban form lends itself well to mixed-use and pedestrian friendly-environment, and the urban core is well-serviced by multi-modal transportation options including public transit services. The multi-modal circulation network accommodates both local and regional trips and supports public transit, walking, bicycling, and vehicular traffic and parking.

The planning area currently has approximately 110 miles of paved streets and 90 signalized intersections. The existing roadway system generally follows a traditional grid pattern. The main regional freeway facilities through the planning area are I-5, I-805, and State Route (SR-54). Both I-5 and I-805 provide north-south movement while SR-54 is an east-west corridor. The City has 15 major arterial roadways providing circulation across the City and to major destination points throughout the region. These streets are typically four lanes and are generally spaced at 0.5 mile intervals. Additionally, the City is served by 30 collector roadways that operate as local conduits to take users in and out of neighborhoods and business districts onto the arterial routes. These are generally two-lane roads with signalized intersections (City of National City 2021b).

The City of National City is served by a regional transit system operated by the San Diego Metropolitan Transit System (MTS). There are nine bus routes running through the City with a total of over 200 bus stops. Rail lines within the planning area are primarily used to transport lumber, cars, and containers that have entered the country via the Port of San Diego at the National City Marine Terminal. The BNSF Railway and the San Diego and Imperial Valley Railway (SDIV) are the two companies currently operating on the rail lines within the planning area. Two MTS Trolley stations are located within the City, which are located on the Blue Line Trolley running from Old Town and Downtown San Diego to the US-Mexico border. The 8th Street Trolley Station is located near the intersection of 8th Street and Harbor Drive and the 24th Street Trolley Station is located near the intersection of 22nd Street and Wilson Avenue. Transit facilities and routes are not located in close proximity to the Project Area. The trolley line does have an at-grade gate crossing of Civic Center Drive under 1-5 between Wilson Avenue and McKinley Avenue.

The City's circulation system supports increased densities and a mix of uses that reduce reliance on personal vehicles by making walking and bicycling more comfortable and convenient. The City has complete "10-minute" neighborhoods, where the time it takes residents to travel for their daily needs through a short walk, bike ride, transit trip, or vehicle drive would generally be 10 minutes or less. By enabling more people to walk, bike, and take transit, the City can make progress towards its climate action goals and reduce GHG emissions. From 2013 to 2019, the City constructed approximately 12 miles of new bicycle facilities (City of National City 2021b).

4.17.2 Transportation (XVII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Less than Significant Impact.

4.17.2.1 Construction Impacts

The Proposed Project would generate short-term construction-related vehicle trips. However, traffic generated during construction of the Proposed Project would be temporary and would not conflict with the City's Transportation Element or Circulation Element. The Project would not impede the implementation of City programs supporting walking, bicycling, and use of public transportation. Impacts would be less than significant.

4.17.2.2 Operational Impacts

Roadway Facilities

The proposed transloading facility will transload bio-diesel fuel, renewable diesel fuel, and either ethanol or sustainable aviation fuel directly from rail cars into trucks. The trucks will deliver fuel to local retailers within a 35-mile radius. Project access will follow a circulation route involving trucks entering the Project Area on West 18th Street from Cleveland Avenue and exiting the Project Area on West 19th Street and Harrison Avenue.

KOA's Traffic Impact Study analyzed 18th Street (Cleveland Avenue west into Project Area), West 19th Street (From Cleveland Avenue to Tidelands Avenue), Cleveland Avenue (from Civic Center Drive to Bay Marina Drive), Tidelands Avenue (from West 19th Street to Civic Center Drive), and Civic Center Drive (from Tidelands Avenue to I-5) (Appendix H). The Project is expected to generate 605 passenger car equivalent daily trips, including 21 weekday a.m. peak hour trips (11 inbound trips and 10 outbound trips) and 33 weekday p.m. peak hour trips (16 inbound trips and 17 outbound trips). The a.m. and p.m. peak hour trips for each of the eight study intersections do not reach the 50-trip threshold during any hour of operation including the a.m. and p.m. peak period. The traffic impact to intersection operation can be considered to be minimal (KOA 2022).

Transit Facilities

Two MTS Trolley stations are located within the City, which are located on the Blue Line Trolley running from Old Town and Downtown San Diego to the US-Mexico border. The 8th Street Trolley Station is located near the intersection of 8th Street and Harbor Drive and the 24th Street Trolley Station is located near the intersection of 22nd Street and Wilson Avenue. Transit facilities and routes are not located in

close proximity to the Project Area. The trolley line does have an at-grade gate crossing of Civic Center Drive under 1-5 between Wilson Avenue and McKinley Avenue (KOA 2022).

Bicycle Facilities

The Bayshore Bikeway is a 26-mile regional bicycle route that encircles San Diego Bay and passes through the City's planning area along Harbor Drive and Tidelands Avenue. It provides a link to the nearby cities of San Diego, Coronado, Imperial Beach, and Chula Vista. In the vicinity of the Project, the Bikeway is a separated bicycle facility that is located to the outside of the southbound lanes. For the Project, outbound truck traffic will use the northbound lanes on Tidelands Avenue, therefore there will be no conflicting traffic movements between Project-generated truck traffic and bicycles on the Bikeway (KOA 2022).

Pedestrian Facilities

Walkability within the Project Area is provided by sidewalks located along West 18th Street, Cleveland Avenue and Civic Center Drive east of Cleveland Avenue. The Project will not impact the use of sidewalks by pedestrians (KOA 2022).

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

Less than Significant Impact.

CEQA Guidelines section 15064.3, subdivision (b) details the use of vehicle miles traveled (VMT) to assess the significance of transportation impacts. As detailed in CEQA Guidelines section 15064.3, subdivision (c), a lead agency may elect to be governed by the provisions of this section immediately. As of July 1, 2020, the provisions of this section apply statewide.

A VMT review was conducted for the Project and the Project is presumed to have a less than significant impact on VMT as it meets the small project exemption (KOA 2022).

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

No Impact.

The Proposed Project would add nine rail spurs and construct five fixed truck loading spots, which will consist of a pump skid, controls, and above-ground piping between the belly of the rail cars and the bottom loading port of the truck. Each spot also provides a concrete pad and drain or containment of

potential spills, which would be piped to a containment basin onsite. The Project does not include any component that would introduce new hazards since the Project does not propose any new roadways. Furthermore, the Project is not proposing a use that could introduce incompatible elements to area roadways. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in inadequate emergency access?	☐	☐	☒	☐

Less than Significant Impact.

4.17.2.3 Construction Impacts

Construction of the Proposed Project would result in temporary construction truck traffic; however, this would not interfere with current emergency access.

4.17.2.4 Operational Impacts

Truck access will follow a circulation route involving trucks entering the Project Area on 18th Street from Cleveland Avenue and exiting on West 19th Street and Harrison Avenue. This route would not impede access for emergency services to the Project Area. Impacts would be less than significant.

4.17.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

4.18.2 Ethnography

The Kumeyaay (also known as Ipai and Tipai) are the Yuman-speaking native people of central and southern San Diego County and the northern Baja Peninsula in Mexico. Spanish missionaries and settlers used the collective term Diegueño for these people, which referred to people living near the presidio and mission of San Diego de Alcalá. Today, these people refer to themselves as Kumeyaay or as Ipai and Tipai, which are northern and southern subgroups of Kumeyaay language speakers, respectively (Luomala 1978). The ancestral lands of the Kumeyaay extend north from Todos Santos Bay near Ensenada, Mexico to Agua Hedionda Lagoon in north San Diego County, and east to the west side of the Imperial Valley.

The primary source of Kumeyaay subsistence was vegetal food. Seasonal travel followed the ripening of plants from the lowlands to higher elevations of the mountain slopes. Acorns, grass and sage seeds, cactus fruits, wild plums, pinyon nuts, and agave stalks were the principal plant foods. Women sometimes transplanted wild onion and tobacco plants to convenient locations and sowed wild tobacco

seeds. Deer, rabbits, small rodents, and birds provided meat. Village locations were selected for seasonal use and were occupied by exogamous, patrilineal clans or bands. Three or four clans might winter together, then disperse into smaller bands during the spring and summer (Luomala 1978).

The Kumeyaay were loosely organized into exogamous patrilineal groups termed sibs, clans, gens, and tribelets by ethnographers. The Kumeyaay term was cimul. The cimul used certain areas for hunting and gathering, but apparently did not control a bounded and defended territory, as did the Luiseño and Cahuilla. In addition, members of several different cimul usually lived in the same residential base, unlike the Luiseño, where a single party or clan controlled a village and its territory. Kumeyaay lived in residential bases during the winter and subsisted on stored resources. No permanent houses were built. Brush shelters were temporary and were not reused the next year. Ceremonies, including rites of passage and ceremonies to ensure an abundance of food, were held in the winter residential bases. The cimul leader directed the ceremonies and settled disputes (Christenson 1990). One of the most important ceremonies was the mourning ceremony. Upon death, the Kumeyaay cremated the body of the deceased. Ashes were placed in a ceramic urn and buried or hidden in a cluster of rocks. The family customarily held a mourning ceremony one year after the death of a family member. During this ceremony, the clothes of the deceased individual were burned to ensure that the spirit would not return for his or her possessions (Gifford 1931; Luomala 1978).

The Kumeyaay were geographically and linguistically divided into western and eastern Kumeyaay. The western and eastern Kumeyaay spoke two different dialects (Christenson 1990). The western Kumeyaay lived along the coast and in the valleys along the drainages west of the mountains. The eastern Kumeyaay lived in the canyons and desert east of the mountains. The western Kumeyaay spent the winter in residential bases in the lowland valleys and then broke into smaller cimul groups that moved gradually eastward toward the mountains, following ripening plants and occupying temporary residential bases along the way. Thus, each group occupied several different residential bases during the course of a year (Christenson 1990). The eastern Kumeyaay spent the winter in villages on the desert margin where water was available from springs at canyon mouths. They moved up the canyons toward the mountains during spring and summer. The eastern and western Kumeyaay met in the mountains in the fall where they gathered black oak acorns, traded, and held ceremonies (Christenson 1990). The large residential bases in the mountains appear archaeologically to be village sites (Gross and Sampson 1990).

The Kumeyaay population was estimated to be between 10,000 and 20,000 at the time of European contact, based on Spanish accounts and ethnographies (Gallegos 2002). Beginning in 1775, the semi-nomadic life of the Kumeyaay began to change as a result of contact with Euro-Americans, particularly from the influence of the Spanish missions. Through successive Spanish, Mexican, and Anglo-American control, the Kumeyaay were forced to adopt a sedentary lifestyle and accept Christianity (Luomala 1978).

4.18.3 Regulatory Setting

4.18.3.1 Assembly Bill 52

Effective July 1, 2015, Assembly Bill (AB) 52 amended CEQA to require that: 1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and 2) for any tribe that responded to the notice within 30 days of receipt with a request for

consultation, the lead agency must consult with the tribe. Topics that may be addressed during consultation include TCRs, the potential significance of project impacts, type of environmental document that should be prepared, and possible mitigation measures and project alternatives.

Pursuant to AB 52, Section 21073 of the Public Resources Code defines California Native American tribes as "a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes.

Section 21074(a) of the PRC defines TCRs for the purpose of CEQA as:

1. Sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    a. included or determined to be eligible for inclusion in the California Register of Historical Resources; and/or

    b. included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; and/or

    c. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Because criteria a and b also meet the definition of a historical resource under CEQA, a TCR may also require additional consideration as a historical resource. TCRs may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their tribal cultural resources and heritage, AB 52 requires that CEQA lead agencies provide tribes that requested notification an opportunity to consult at the commencement of the CEQA process to identify TCRs. Furthermore, because a significant effect on a TCR is considered a significant impact on the environment under CEQA, consultation is used to develop appropriate avoidance, impact minimization, and mitigation measures.

4.18.3.2 Summary of AB 52 Consultation

On March 21, 2023, the City sent Project notification letters to the following California Native American tribes, which had previous submitted general consultation request letters pursuant to 21080.3.1(d) of the Public Resources Code:

- Barona Group of Capitan Grande
- Sycuan Band of the Kumeyaay Nation
- La Posta Band of Diegueno Mission Indians

- Viejas Band of Kumeyaay Indians
- Manzanita Band of Kumeyaay Nation
- Campo Band of Mission Indians
- San Pasqual Band of Mission Indians
- Jamul Indian Village
- Mesa Grande Band of Mission Indians
- Ewiiapaayp Band of Kumeyaay Indians
- Kwaaymii Laguna Band of Mission Indians
- Iipay Nation of Santa Ysabel
- Inaja Band of Mission Indians

Each recipient was provided a description of the Project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation. The 30-day response period concluded on April 20, 2023. As a result of the initial notification letters, the City of National City received the following responses:

- Mesa Grande Band of Mission Indians: Ms. Murphy responded by mail on March 24, 2023, indicating that Michael Linton is no longer the tribal chairperson and any future correspondence should be addressed to their current chairperson, Theresa Hernandez.

No response was received from the other contacted California Native American tribes.

In accordance with CEQA, the AB-52 consultation process was conducted by DTSC for the remediation area at 1700 Cleveland Avenue. DTSC proceeded with the tribal outreach and consultation process, consistent with the Tribal Consultation Policy of 2020. Based on inquiries sent to NAHC, the site is recognized as TRCs. The implementation of the IMW required the presence of a Native American Monitor and/or professional archaeologist, as selected by the tribe, to observe ground disturbing activities. This assured the identification and protection of any TRCs encountered at the site for the separate remediation project.

4.18.4 Tribal Cultural Resources (XVIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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.	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

i-ii) As previously noted, two cultural resources have been previously identified within the Project Area: P-37-013073, the Coronado Railroad; and P-37-024739, the BNSF (formerly AT&SF) Railway. P-37-013073 was previously evaluated and found not eligible for inclusion on the NRHP or CRHR. P-37-024739 was previously evaluated and found eligible for the NRHP and CRHR. The Proposed Project includes the construction and placement of a mechanical railroad switch (i.e., turnout) to bring rail cars from the railroad mainline to the Project Site along the segment of rail that is associated with the P-37-024739 feature. The installation of the railroad switch mechanism would be added on to the existing railroad and would not result in a significant impact to the segment of railroad associated with the P-37-024739 feature as it would not result in the diminishment in the integrity of the resource.

A search of the Sacred Lands File by the California NAHC was requested on January 28, 2022. The search will determine whether or not the California Native American tribes within the Project Area have recorded Sacred Lands, because the Sacred Lands File is populated by members of the Native American community with knowledge about the locations of tribal resources. The search of the Sacred Lands File as conducted

by the NAHC was negative, indicating the absence of previously recorded Native American resources in the Project Area (ECORP 2022d).

Ground-disturbing activities have the potential to result in the discovery of, or inadvertent damage to, archaeological contexts, and this possibility cannot be eliminated. Consequently, there is a potential for significant impacts to TCRs. The implementation of Mitigation Measure **CUL-2** would reduce the potential impacts to less than significant.

4.18.5 Mitigation Measures

CUL-2: **Native American Monitoring.** A Native American monitor from a tribe that is traditionally and culturally affiliated with the Project Area should be retained to monitor all ground-disturbing activities associated with Project construction, including vegetation removal, clearing, grading, trenching, excavation, or other activities that will disturb original (pre-project) ground. The Native American monitor should have the authority to temporarily pause activity at the location in the event of an unanticipated discovery, so that he or she can coordinate with the Project archaeologist on the identification of a potential cultural resource and the Project archaeologist can direct the procedures in Mitigation Measure CUL-3.

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

4.19.1.1 Water Service

Water service for the City of National City is provided by Sweetwater Authority, which also provides for the City of Chula Vista and portions of the County of San Diego. The Project Area is located in the City of National City division of Sweetwater Authority (Sweetwater Authority 2022). About 70 percent of the water distributed by Sweetwater Authority comes from local supplies, including Sweetwater River Watershed, Sweetwater River, the Sweetwater Alluvium, and San Diego Groundwater Formation. The remainder of the water supply is obtained from imported water sources, purchased from the San Diego County Water Authority (SDCWA). It is transported from the Colorado River or the State Water Project (City of National City 2011f).

4.19.1.2 Wastewater

The City's wastewater division of the City maintains approximately 97 miles of sanitary sewer main, 45 miles of closed storm collection systems, and 4 pump stations to provide sewer service to the area generally within its corporate limits, and receives inflows from the City of San Diego and the U.S. Navy in route to the regional South Metro Interceptor (SMI) (City of National City 2011f; Infrastructure Engineering Corporation [IEC] 2011).

4.19.1.3 Solid Waste

Residential and commercial solid waste collection and recycling services for the City are performed under the contract to residents and businesses by EDCO Disposal (City of National City 2011f).

4.19.2 Utilities and Service Systems (XIX) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

The Proposed Project is the construction of a transloading facility to transload bio-diesel fuel and renewable diesel fuel directly from rail cars into trucks. No new or expanded water or wastewater treatment facilities would be required. Further, the Proposed Project would not impact natural gas, electric power, or telecommunications facilities. The environmental effects from constructing the proposed transloading facility are described in this Initial Study. Impacts would be less than significant, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) 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.

Sweetwater Authority has estimated water supply and demand within its service area, including the City of National City, in its 2020 Draft Urban Water Management Plan (UWMP) and addresses water demand and supply throughout the service area. Local sources have met approximately 45 percent of the water needs within Sweetwater Authority's service area, while 55 percent balance has been met with imported water purchased from the SDCWA. Water supplies available are sufficient to meet all existing customer demands and anticipated future customer demands, including the Project's demands under normal and single-dry years through 2045. However, supply limitations that arise in multiple dry year scenarios must be addressed through implementation of extraordinary water conservation measures because supplies and demands would be equal and there would be no surplus or deficit. The UWMP also discloses that, in a

declared water emergency, the Water Shortage Contingency Plan, will address drought planning, water shortage response levels and actions, and management of water allocations (Sweetwater Authority 2021).

The Proposed Project would construct a transloading facility to transload bio-diesel fuel and renewable diesel fuel directly from rail cars into trucks and does not include withdrawal of groundwater. The Proposed Project would only require minimal water during construction for compaction and dust control purposes. During operation the Proposed Project would not require water. Impacts would be less than significant, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

According to the City's 2011 Sewer System Master Plan, the City has average daily capacity rights of at least 7.10 million gallons per day (mgd) in the SMI and the City is currently utilizing 4.25 mgd of their average daily flow capacity in the SMI. The projected average daily wastewater flows with treatment costs allocated to the City are expected to increase 56 percent to 6.57 mgd by 2027. Based on these projections, there is no additional SMI capacity required to accommodate the projected daily wastewater flows. Additionally, the City maintains a System Evaluation and Capacity Assurance Plan to provide estimates of peak flows associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies, and the major sources that contribute to the peak flows associated with overflow events (City of National City 2009). The Proposed Project will provide a 40-foot trailer as an onsite office and restroom facilities will be provided for driver use. Project components do not include any connection to the sewer system and no septic tank will be required. A vendor will be utilized to dispose of waste from the restroom facilities. No impact would occur, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less than Significant Impact.

All solid waste in the City is collected by EDCO Waste and Recycling Services. Non-recyclable solid waste is sent to the Otay Landfill, located at 1700 Maxwell Road in Chula Vista, approximately ten miles south of

National City and operated by Allied Waste Industries. Recyclable materials are processed by EDCO at one of its three Material Recovery Facilities (MRFs) in Southern California (City of National City 2011f). Otay Landfill has a maximum permit capacity of 61,154,000 tons and a remaining capacity of 21,194,008 tons (CalRecycle 2022a). Minimal waste would be generated by the Proposed Project during construction. Solid waste during operation would come from garbage receptacles in the trailer which will be an onsite office. According to the City of Los Angeles CEQA Thresholds Guide, the typical waste generation rate for a commercial project is 10.53 lb/employee/day. The estimate is prior to recycling, composting, or other waste diversion programs (CalRecycle 2022b). A total of 12 employees will work on the site per day, therefore, total commercial waste generation would be 126.36 lbs/day total . The Proposed Project is not anticipated to generate solid waste in excess of state or local standards. Impacts would be less than significant, and no mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

No Impact.

Waste generated by the Proposed Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste. No impact would occur, and no mitigation is required.

4.19.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.20 Wildfire

4.20.1 Environmental Setting

Government Code 51175-89 directs CAL FIRE to identify areas of very high fire hazard severity zones within Local Responsibility Areas. Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior, and expected burn probabilities to quantify the likelihood and nature of vegetation fire exposure to buildings. According to the CAL FIRE Very High Fire Hazard Severity Zone Map, the Project Area is not located within a VHFHSZ (CAL FIRE 2022).

4.20.2 Wildfire (XX) Environmental Checklist and Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

No Impact.

According to the 2018 San Diego County Emergency Operations Plan, primary evacuation routes consist of the major interstates, highways, and prime arterials within San Diego County. Local jurisdictions will work with the San Diego County Operational Area (OA) Emergency Operations Center (EOC), San Diego Sheriff's Department, Caltrans, and other applicable agencies/departments to identify evacuation points and transportation routes. I-5, 1-805, and SR-54 are primary evacuation routes within National City that identified in the Plan. Arterial roads near the Project Area include Harbor Drive, West 8th Street, National City Boulevard, and Bay Marina Drive (San Diego County 2018).

4.20.2.1 Construction Impacts

Construction of the Proposed Project would result in temporary construction truck traffic; however, this would not interfere with current evacuation routes.

4.20.2.2 Operational Impacts

Truck access will follow a circulation route involving trucks entering the Project Area on 18th Street form Cleveland Avenue and exiting on West 19th Street and Harrison Avenue. These streets are not prime arterials identified in the City's General Plan and would not be used as primary evacuation routes.

Because the Project Area is not located in or near a VHFHSZ, no impact would occur (CAL FIRE 2022). No mitigation is required.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

Topography for the Project Area is generally flat, and it has been developed since at least 1904. The southern portion of the Project Area is relatively flat lying with gentle sheet grades that typically slope down to the northwest. The Proposed Project would not substantially alter the slope, wind patterns, or

other factors that could exacerbate wildfire risks. Thus, the Proposed Project would not expose Project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Furthermore, the Project Area is not located in a VHFHSZ (CAL FIRE 2022). No impact would occur, and no mitigation is required.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Proposed Project is located within an urbanized area and would not exacerbate fire risk or impacts to the environment. Furthermore, the Project Area is not located in a VHFHSZ (CAL FIRE 2022). As such, no impact would occur, and no mitigation is required.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project Area is relatively flat and is not likely to cause downstream flooding or landslides. The Proposed Project would not substantially alter the drainage patterns of the Project Area, and thus would not expose people or structures to significant risks from runoff or post-fire instability. Furthermore, the Project Area is not located in a VHFHSZ (CAL FIRE 2022). No impact would occur, and no mitigation is required.

4.20.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.21 Mandatory Findings of Significance

4.21.1 Mandatory Findings of Significance (XXI) Environmental Checklist and Discussion

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

As discussed throughout this Initial Study, potentially significant impacts were identified for biological resources and cultural resources. The Proposed Project's impacts would be less than significant with incorporation of Mitigation Measures **BIO-1** through **BIO-3** and **CUL-1** through **CUL-3**.

Impacts from the Proposed Project on all other environmental issue areas are discussed in corresponding sections of this Initial Study. As discussed in their respective sections of this Initial Study document, no significant impacts have been identified..

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

Less than Significant Impact.

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects that, when considered together or in concert with other projects combine to result in a significant impact within an identified geographic area. In order for a project to contribute to cumulative impacts, it must result in some level of impact on a project specific level.

As discussed throughout this Initial Study, potentially significant impacts were identified for biological resources and cultural resources. The Proposed Project's contribution to cumulative impacts would not be considerable with the incorporation of Mitigation Measures **BIO-1** through **BIO-3** and **CUL-1** through **CUL-3**. Furthermore, other foreseeable projects would be subject to CEQA and would undergo the same level of review as the Proposed Project and include mitigation measures to minimize potentially significant impacts.

The analysis within this Initial Study demonstrates that the Project would not have any individually limited, but cumulatively considerable impacts. As presented in the analysis provided in this Initial Study, the Project has no impact, a less than significant impact, or a less than significant impact with implementation of mitigation with respect to all environmental issues. Due to the limited scope of direct physical impacts to the environment associated with this development project, the Project's impacts are Project-specific in nature. With implementation of the proposed mitigation measures found throughout this document, the Project will not result in significant, unavoidable, adverse environmental impacts. Impacts from the Proposed Project would not be cumulatively considerable.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated.

The checklist categories of: Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Cultural, Geology and Soils, Hydrology and Water Quality, Population and Housing, Tribal Cultural Resources, Noise, Transportation, and Wildfire evaluate Project impacts that may have adverse effects on human beings, either directly or indirectly. All of the Project's impacts on human beings, both direct and indirect, that are attributable to the Project were identified and mitigated where necessary. Therefore, the Proposed Project would not either directly or indirectly cause substantial adverse effects on human beings because all potentially adverse direct and indirect impacts of the Proposed Project are identified as having no impact, less than significant impact, or less than significant impact with mitigation. Direct and indirect impacts to human beings would be less than significant with the implementation of mitigation measures listed in this Initial Study.

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