San Diego Miramar College Aviation Instructional Center at Montgomery-Gibbs Executive Airport

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Acronyms and Abbreviations

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
µPa	micro-Pascals
AAM	annual arithmetic mean
AB	Assembly Bill
AC	Advisory Circular
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADT	average daily trips
AF	acre-feet
AIA	Airport Influence Area
AIC	Aviation Instructional Center
ALP	Airport Layout Plan
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMP	Airport Layout Plan
AMSL	above mean sea level
Attainment Plan	2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMP	best management practice
BTU	British thermal unit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act

Acronyms and Abbreviations (cont.)

CFC	California Fire Code
CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of San Diego
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of San Diego
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CVOC	chlorinated volatile organic compound
CWA	Clean Water Act
CWUIC	California Wildland Urban Interface Code
dB	decibel
dBA	A-weighted decibels
District	San Diego Community College District
DOC	California Department of Conservation
DPM	diesel particulate matter
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
ECC	emerging chemicals of concern
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EO	Executive Order
ESL	Environmentally Sensitive Lands
EUI	energy usage intensity
EV	electric vehicle
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration

Acronyms and Abbreviations (cont.)

GHG	greenhouse gas
g/L	grams per liter
GWP	global warming potential
HA	hydrologic area
HABS	Historic American Buildings Survey
HELIX	HELIX Environmental Planning, Inc.
HFC	hydrofluorocarbon
HMBP	Hazardous Materials Business Plan
HU	hydrologic unit
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I-	Interstate
IBC	International Building Code
IPCC	Intergovernmental Panel on Climate Change
kBTU	kilo British Thermal Units
km	kilometer
KPI	Key Performance Indicator
kWh	kilowatt hour
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
L_{EQ}	time-averaged noise level
LID	low impact development
LLG	Linscott, Law & Greenspan Engineers
LUST	leaking underground storage tank
L_V	vibration velocity level
MBTA	Migratory Bird Treaty Act
MCAS	Marine Air Corps Station
mgd	million gallons per day
MHPA	Multi-Habitat Planning Area
MLD	most likely descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MPO	Metropolitan Planning Organization
MRZ	mineral resource zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	metric ton
MTS	Metropolitan Transit System

Acronyms and Abbreviations (cont.)

MWELO	Model Water Efficient Landscaping Ordinance
MWD	Metropolitan Water District of Southern California
MWh	megawatt hours
MYF	Montgomery-Gibbs Executive Airport
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NCCP	Natural Community Conservation Planning
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOD	Notice of Determination
NOP	Notice of Preparation
NO_2	nitrogen dioxide
NO_x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
PCB	Polychlorinated Biphenyl
PEIR	Program Environmental Impact Report
PFC	perfluorocarbon
PG&E	Pacific Gas & Electric
PM	particulate matter
PM_{10}	coarse particulate matter, 10 microns or less in diameter
$PM_{2.5}$	fine particulate matter, 2.5 microns or less in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
project	San Diego Miramar College Aviation Instructional Center at Montgomery-Gibbs Executive Airport; Miramar College AIC Project
PUD	City of San Diego Public Utilities Department
PV	photovoltaic

Acronyms and Abbreviations (cont.)

RAQS	2022 Revision to the Regional Air Quality Strategy for San Diego County
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gas
ROW	right-of-way
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	San Diego Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDIA	San Diego International Airport
SDPD	San Diego Police Department
SDRHR	San Diego Register of Historic Resources
SDUSD	San Diego Unified School District
SF	square foot/feet
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SO_2	sulfur dioxide
SoCalGas	Southern California Gas
SPL	sound pressure level
SR	State Route
STC	Sound Transmission Class
SWIS	Solid Waste Information System
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCA	traditionally and culturally affiliated
TMDL	Total Maximum Daily Load
TPH	total petroleum hydrocarbons
TSM	Transportation Study Manual

Acronyms and Abbreviations (cont.)

USACE	U.S. Army Corps of Engineers
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S Fish and Wildlife Service
UST	underground storage tanks
UWMP	Urban Water Management Plan
VdB	vibration velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
VPHCP	Vernal Pool Habitat Conservation Plan
WEAP	Worker Environmental Awareness Program
WPCP	Water Pollution Control Plan
WQIP	Water Quality Improvement Plan
WQTR	Water Quality Technical Report
WTP	Water Treatment Plant

EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) for the proposed San Diego Miramar College Aviation Instructional Center at Montgomery-Gibbs Executive Airport Project (Miramar College AIC Project or project) has been prepared on behalf of the San Diego Community College District (District) in compliance with the California Environmental Quality Act (CEQA). The District is the CEQA Lead Agency for the EIR and, as such, has the primary responsibility for evaluating the environmental effects of the proposed project and considering whether to approve the proposed project in consideration of these effects.

As required by CEQA, this EIR includes the following information: (1) a description of the proposed project, including its location, objectives, and features; (2) a description of the existing conditions at the project site and surrounding areas; (3) an analysis of the direct, indirect, temporary, permanent, and cumulative adverse physical effects that would occur to existing conditions should the proposed project be approved and implemented; (4) an identification of feasible means of avoiding or substantially lessening the significant adverse effects; (5) a determination of significance for each impact after mitigation is incorporated; and (6) an evaluation of a reasonable range of alternatives to the proposed project that would meet the basic project objectives and reduce a project-related significant environmental impact.

This Executive Summary provides an overview of the project and its objectives, summarizes the environmental impacts of the project and recommended mitigation measures, discloses areas of controversy and issues to be resolved, and identifies project alternatives.

ES.1 Project Summary

ES.1.1 Project Location

The project site is located at 3873 Kearny Villa Road within the Kearny Mesa Community Plan area in the central portion of the City of San Diego (City), San Diego County (County), California. The proposed project site is generally located north of Aero Drive, south and east of State Route (SR) 163 and Kearny Villa Road, and west of Interstate (I-) 15 and Ruffin Road. The project is proposed on a 1.06-acre site that is currently comprised of the 6,300 square foot (SF) Miramar Hangar, surface parking, and gravel and paved areas used for aircraft and engine testing as discussed further in Section 2.2 below.

The project site is located in the southwest quadrant of the Montgomery-Gibbs Executive Airport (referred to as the "Airport" or by its Federal Aviation Administration [FAA] identifier "MYF") which is owned and operated by the City Airports Division as a general aviation airport. MYF is located north of Aero Drive, east of SR 163, south of Balboa Avenue, and west of Ruffin Road. The project site is additionally located within the community of Kearny Mesa, which is approximately 4,400 acres and is bound by SR 52 to the north, I-805 to the west, I-15 to the east, and properties lying to the south of Aero Drive and along the western edge of I-15 to the south. MYF occupies over 550 acres of the Kearny Mesa community.

Land uses surrounding the project site include SR 163, the San Diego Police Department Air Support Unit building, the Spiders Aircraft Services Inc. building, and undeveloped areas associated with MYF to the north, a hotel and recreational space to the south, San Diego Fire-Rescue Department (SDFD) Station 28

to the southwest, Kearny Villa Road and SR 163 to the west, and MYF runways, taxiways, and associated structures to the east.

ES.1.2 Project Background and History

Approximately 0.42 acre of the project site has been leased to the District by the City since 1984 for use by the Aviation Operations Program offered through Miramar College. The District is a community college district which includes three credit colleges (San Diego City College, Mesa College, and Miramar College) and the state's only free-standing noncredit college (San Diego College of Continuing Education). The District is the third largest public community college district in California, serving approximately 90,000 students annually across the four colleges. During the 2024-2025 academic year, Miramar College served approximately 8,591 full-time students and a total annual headcount of 25,387 students (District 2025).

The Aviation Operations Program is offered through the Miramar College campus, which integrates simulator flight training with academic study and emphasizes a combination of the technical fundamentals of flight, airport operations, human factors, group dynamics, and safety. Miramar College's Aviation Operations Program meets all requirements of the FAA Part 141 Pilot Ground School. While the Aviation Operations Program does not offer flight training, the program includes all required ground training and flight simulator labs. Aviation Operations Program courses are offered both on the Miramar College campus and off campus at the project site, also known as the Montgomery Field Aviation Classroom. The Montgomery Field Aviation Classroom hosts approximately 13 class sessions per week, each containing approximately 15 to 35 students and one to two faculty members. Daytime and evening courses are offered through this program. Courses at the Montgomery Field Aviation Classroom involve instruction within the Miramar Hangar and on the eastern portion of the site where hands-on engine testing instruction occurs.

In 2017, the City began developing an update to the Montgomery Gibbs Executive Airport Master Plan (AMP) to determine the extent, type, and schedule of development needed based on current projections. An AMP presents the community and airport's vision for a 20-year strategic development plan based on the forecast of activity and is used as a decision-making tool and is intended to complement other local and regional plans. The Draft AMP for MYF identifies existing and future conditions, an Airport Layout Plan (ALP), and a schedule of priorities and funding sources for proposed improvements. The ALP graphically depicts planned development at the airport within the 20-year planning period of the Draft AMP. The existing Miramar Hangar that is located on the project site is identified as existing Building 8, Large Box Hangar. The ALP identifies the southern portion of the project site as an area for future development of hangars during the long-term phase of airport development under the AMP (11-20 years). The southernmost portion of the project site would overlap with the project site for project 3-8 identified on the Draft ALP, which includes the construction of additional hangars. However, construction of the project's southern parking area would not be within the building footprint of these hangars.

In October 2025, the City, as Lead Agency, released the draft Montgomery Gibbs Executive Airport Master Plan Program Environmental Impact Report (PEIR; SCH No. 20190209034) for public review (City 2025). As described in the PEIR, Building 8 along with two adjacent buildings, 6 and 7, were evaluated for their historic potential and were determined to be eligible for listing in the San Diego Register of Historic Resources, the California Register of Historical Resources (CRHR), and the National Register of

Historic Places (NRHP). Partially due to their status as resources eligible for listing, the Draft AMP and PEIR determined that these hangars would be retained in their current state (City 2025).

The District, as Lead Agency, is required to satisfy the requirements of CEQA (PRC Section 21000 et seq.) and the CEQA Guidelines (CCR Title 14, Section 15000 et seq.) for discretionary actions proposed on the project site. The project would involve the demolition of the Miramar Hangar (Building 8). As the proposed project would deviate from the Draft AMP and underlying assumptions of the analysis contained in the PEIR and the PEIR for the Draft AMP has not been certified, the project would not meet the requirements outlined in CEQA Guidelines Section 15152 and 15168 that would allow for tiering from the City's Draft AMP PEIR for MYF.

ES.1.3 Project Components

ES.1.3.1 Aviation Instructional Center

The project would involve the demolition of the existing 6,300 SF Miramar Hangar and construction of a new upgraded instructional facility, referred to as the Miramar College Aviation Instructional Center (AIC), and supporting facilities. The upgraded instructional facility would support the programs offered within the Aviation Operations Program at Miramar College, including the specific programs of Aircraft Maintenance, Pilot Training, and Air Traffic Control. The proposed Miramar College AIC would be approximately 18,000 SF and would be in the same general location as the existing hangar in the northwestern portion of the project site. To accommodate this upgraded instructional facility and the needs of the Aviation Operations Program, the project would additionally involve the expansion of the existing 0.42-acre lease area to 1.06 acres.

The expanded instructional facility would allow for an additional 15 class sessions per week to occur (three class sessions per day), for a total of 28 class sessions per week. Each class session would contain an average of 23 students. The engine testing activity, which occurs on the eastern portion of the project site once a week under existing conditions, would occur twice a week in the same location to account for these additional class sessions. Class sessions would occur between 8:00 a.m. and 10:00 p.m. Monday through Friday, with the potential for special Saturday class sessions to occur.

The new Miramar College AIC building would be two stories and be a maximum height of 32 feet. Level 1 would include a lobby, a maintenance/hangar bay, two classrooms, offices, a custodial room, restrooms, and utility and storage rooms. In addition, trash enclosures, an air compressor, and a hazardous waste collection area would be located along the northern perimeter of Level 1. Level 2 would include one classroom, four pilot debrief rooms, air traffic control tower and en route training facilities, a conference room, break room, and restrooms.

The project would additionally include repaving of the existing open-air storage area and engine testing pad on the eastern portion of the project site. Access would continue to be provided by the existing MYF Gate 4 east of Kearny Villa Road which would connect to a paved parking area located southeast of the new hangar. This parking area would provide approximately 70 parking spaces for students and faculty and would include nine electric vehicle (EV) ready spaces and seven EV charging spaces. An additional nine parking spaces would be provided along the southern perimeter of the proposed Miramar College AIC which would include four Americans with Disabilities Act (ADA) accessible spaces and one EV charging station. Bicycle racks and secure bicycle storage lockers would be provided near the southeastern area of the Miramar College AIC. Additional site improvements would include the addition

of accessible paths of travel within the lease area. The fence located along the western boundary of the project site would remain in its existing location, and a new gate would be installed where the existing gate is located.

ES.1.3.2 Utilities

The project would include the construction of connections to existing City-owned utility lines located in Kearny Villa Drive to the west of the project site, including water and fire water. The project would involve the installation of a new sewer lateral to connect to an existing on-site sewer main located west of the proposed Miramar College AIC. In addition, the project would involve coordination with San Diego Gas and Electric (SDG&E) for new underground electric power lines which would connect to a new SDG&E transformer which would be installed on the western side of the proposed building. The project would not involve natural gas connections. The project would include the installation of a storm drain along the perimeter of the proposed hangar which would connect to a modular wetland system and underground vault located near the southwestern corner of the hangar.

In addition, a storm drain would be constructed along the central portion of the parking lot which would connect to a modular wetland system and underground vault located in the western portion of the parking lot. The modular wetland system is a stormwater treatment Best Management Practice (BMP), integrated with an underground vault BMP, low-flow sump pump, outlet control structure, and storm drain conveyance. It is not intended to function as an open constructed wetland, open pond, or surface detention basin. The modular wetland system would collect and convey runoff through inlets, piping, and manufactured treatment/storage components without creating persistent above-ground standing water. This allows the project to address stormwater treatment and Low Impact Design requirements while minimizing bird, wildlife, and vector attractant potential within the airport environment.

ES.1.3.3 Sustainability

Consistent with the District Sustainability Levels framework, the proposed project would be designed to achieve the level of Certified/ Coast Live Oak (Sustainable Performance). To achieve this performance level, the project would be an all-electric development and include features such as utilization of recycled construction materials, high-efficiency low-flow plumbing fixtures, and water-conserving appliances.

ES.1.3.4 Project Construction

Construction is anticipated to begin in September 2027 and be completed in September 2028, with District courses resuming in the new facility in the Fall 2028 semester. The construction staging area would be located within the southern portion of the project site. During construction of the project, the District would continue aviation instruction at a temporary location that is yet to be determined.

ES.1.3.5 New Ground Lease

To implement the project, the District would enter into a new long-term ground lease with the City of San Diego, with new lease terms and the lease area being expanded from the existing 0.42-acre ground lease area to 1.06 acres.

ES.1.4 Project Objectives

CEQA Guidelines Section 15124(b) requires that an EIR contain a statement of the objectives sought by a project and states, "a clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations." The general purpose of the proposed project is to provide an expanded and modernized instructional facility for the Aviation Operations Program offered at Miramar College. The following specific objectives have been identified for the proposed project:

1. Expand and upgrade the existing instructional space to allow for segmented classroom, office, storage, pilot debrief, and air traffic control spaces to improve the student and faculty experience and provide for the anticipated growth of the Aviation Operations Program at Miramar College.

2. Meet regional workforce needs through the provision of an educational space that promotes high-quality hands-on aviation experience within an existing airport setting to prepare students for employment in an aviation-related career field.

3. Provide a modernized instructional space to align with current building codes related to structural integrity, safety, and accessibility.

4. Minimize the loss of instructional space and interruptions to the Aviation Operations Program during construction by providing an adequate off-site location for continued instruction.

5. Incorporate sustainability features to align with state climate targets and the California Community Colleges Chancellor's Office directives related to greenhouse gas emissions reduction, energy efficiency, resource conservation, and green building standards.

ES.2 Summary of Environmental Effects and Mitigation Measures

This EIR examines the potential environmental effects of the proposed project, considering information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid potential environmental impacts. Table ES-1, *Summary of Project Impacts and Mitigation Measures*, provides a summary of the environmental impacts that could result from implementation of the proposed project, feasible mitigation measures that would reduce or avoid the potentially significant impacts, and conclusions as to whether the potentially significant impacts have been mitigated below a level of significance. Impacts related to agricultural and forestry resources, mineral resources, population and housing, and recreation were determined to not present a potentially significant environmental impact and are discussed further in Section 4.0, *Effects Found Not to be Significant*.

Table ES-1
SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Aesthetics						
Scenic Vistas	The proposed project would not have a substantial adverse effect on a scenic vista.	LS	LS	No mitigation is required.	--	--
Scenic Resources	The proposed project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	LS	LS	No mitigation is required.	--	--
Visual Character and Quality	The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.	LS	LS	No mitigation is required.	--	--
Light and Glare	The proposed project would not create a new source of substantial light and glare which would adversely affect day or nighttime views in the area.	LS	LS	No mitigation is required.	--	--
Air Quality						
Air Quality Plans	The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	LS	LS	No mitigation is required.	--	--
Air Quality Standards	The proposed project 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.	LS	LS	No mitigation is required.	--	--
Sensitive Receptors	The proposed project would not expose sensitive receptors to substantial pollutant concentrations during construction.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Odors	The proposed project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people.	LS	LS	No mitigation is required.	--	--
Biological Resources						
Special-Status Species	The proposed project could result in a substantial adverse effect on special-status species.	PS	PS	BIO-1, Ponding Checks and Fairy Shrimp Survey BIO-2, Resource Protection BIO-3, Construction Monitoring BIO-4, Western Spadefoot Avoidance BIO-5, Burrowing Owl Preconstruction Surveys BIO-6, Nesting Bird Survey	LS	LS
Sensitive Habitats	The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.	LS	LS	No mitigation is required.	--	--
Wetlands	The proposed project would not have a substantial adverse effect on state or federally protected wetlands.	N	N	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Wildlife Corridors	The proposed project would not interfere substantially with wildlife movement, wildlife corridors, or the use of nursery sites.	LS	LS	No mitigation is required.	--	--
Local Policies or Ordinances	The proposed project would not conflict with a local policy or ordinance protecting biological resources.	N	N	No mitigation is required.	--	--
Conservation Plans	The proposed project would not conflict with the provisions of an adopted habitat conservation plan.	LS	LS	No mitigation is required.	--	--
Cultural Resources						
Historic Resources	The proposed could cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	PS	PS	HIST-1, HABS Documentation	SU	SU
Archaeological Resources	The proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	LS	LS	No mitigation is required.	--	--
Human Remains	The proposed project would not disturb human remains.	LS	LS	No mitigation is required.	--	--
Energy						
Energy Consumption	The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	LS	LS	No mitigation is required.	--	--
Energy Efficiency Plans	The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Geology and Soils						
Seismic Hazards	The proposed project would not directly or indirectly cause potential substantial adverse effects involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure; or landslides given adherence to applicable building codes and geotechnical recommendations.	LS	LS	No mitigation is required.	--	--
Soil Erosion	The proposed project would not result in substantial soil erosion or the loss of topsoil given adherence to applicable erosion control requirements.	LS	LS	No mitigation is required.	--	--
Geologic Instability	The proposed project would not 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 given adherence to applicable building codes and geotechnical recommendations.	LS	LS	No mitigation is required.	--	--
Expansive Soil	The proposed project would not 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 given adherence to applicable building codes and geotechnical recommendations.	LS	LS	No mitigation is required.	--	--
Septic Tanks	The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	N	N	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Paleontological Resources	The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	PS	PS	GEO-1, Monitoring GEO-2, Treatment of Fossil Discoveries GEO-3, Inadvertent Fossil Discoveries	LS	LS
Greenhouse Gas Emissions						
Greenhouse Gas Emissions	The proposed project would not generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment.	LS	LS	No mitigation is required.	--	--
Greenhouse Gas Emission Reduction Plans	The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	LS	LS	No mitigation is required.	--	--
Hazards and Hazardous Materials						
Routine Transport, Use, or Disposal of Hazardous Materials	The proposed project would not result in substantial adverse effects related to the transport, use, or disposal of hazardous materials given adherence to applicable hazardous waste regulations.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Accidental Release of Hazardous Materials	The proposed project would not 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.	LS	LS	No mitigation is required.	--	--
Hazards to Schools	The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school.	LS	LS	No mitigation is required.	--	--
Hazardous Materials Sites	The proposed project would not 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 not create a significant hazard to the public or the environment.	LS	LS	No mitigation is required.	--	--
Airport Hazards	The proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.	LS	LS	No mitigation is required.	--	--
Emergency Response Plans	The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LS	LS	No mitigation is required.	--	--
Wildland Fires	The proposed project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Hydrology and Water Quality						
Water Quality Standards	The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	LS	LS	No mitigation is required.	--	--
Groundwater Supplies and Recharge	The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	LS	LS	No mitigation is required.	--	--
Drainage Patterns	The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows.	LS	LS	No mitigation is required.	--	--
Inundation	The proposed project, in flood hazard, tsunami, or seiche zones, would not risk release of pollutants due to project inundation.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Water Quality and Groundwater Management Plans	The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LS	LS	No mitigation is required.	--	--
Land Use and Planning						
Community Division	The proposed project would not physically divide an established community.	N	N	No mitigation is required.	--	--
Land Use Plans, Policies, and Regulations	The proposed project could 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.	PS	PS	HIST-1, HABS Documentation NOI-2, Construction Vibration Limits Near Historic Structures	SU	SU
Noise						
Increase in Ambient Noise Levels	The proposed project could generate 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.	PS	PS	NOI-1, Test Engine Noise Level Reduction Measures	LS	LS
Ground-borne Vibration	The proposed project could result in generation of excessive ground-borne vibration or ground-borne noise levels.	PS	PS	NOI-2, Construction Vibration Limits Near Historic Structures	LS	LS

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Airport Noise Exposure	The proposed project could expose people residing or working in the project area to excessive noise levels.	PS	PS	NOI-3, Classroom Building Exterior-to-Interior Noise Limits	LS	LS
Public Services						
Fire Protection	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities.	LS	LS	No mitigation is required.	--	--
Police Protection	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities or the need for new or physically altered police protection facilities.	LS	LS	No mitigation is required.	--	--
Schools	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities.	LS	LS	No mitigation is required.	--	--
Parks	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities or the need for new or physically altered park facilities.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Other Public Facilities	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities.	LS	LS	No mitigation is required.	--	--
Transportation						
Circulation Programs, Plans, Ordinances, and Policies	The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LS	LS	No mitigation is required.	--	--
Vehicle Miles Travelled	The proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	LS	LS	No mitigation is required.	--	--
Hazardous Design Features	The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LS	LS	No mitigation is required.	--	--
Emergency Access	The proposed project would not result in inadequate emergency access.	LS	LS	No mitigation is required.	--	--
Tribal Cultural Resources						
Tribal Cultural Resources	The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource, that is 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 PRC Section 5024.1.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Utilities and Service Systems						
Relocation or Construction of Utilities	The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities resulting in significant environmental effects.	LS	LS	No mitigation is required.	--	--
Water Supplies	The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	LS	LS	No mitigation is required.	--	--
Wastewater Treatment	The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LS	LS	No mitigation is required.	--	--
Solid Waste Generation	The proposed project would not generate solid waste in excess of state or local standards, or in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LS	LS	No mitigation is required.	--	--
Solid Waste Regulations	The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	LS	LS	No mitigation is required.	--	--
Wildfire						
Emergency Plans	The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	LS	LS	No mitigation is required.	--	--

Issue	Impact	Project Significance Before Mitigation	Cumulative Significance Before Mitigation	Mitigation Measure(s)	Project Significance After Mitigation	Cumulative Significance After Mitigation
Wildfire Risks	The proposed project would not exacerbate wildfire risks and would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	LS	LS	No mitigation is required.	--	--
Infrastructure Installation	The proposed project would not 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.	LS	LS	No mitigation is required.	--	--
Post-Fire Risks	The proposed project would not 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.	LS	LS	No mitigation is required.	--	--

LS = Less than Significant; PS = Potentially Significant; SU = Significant and Unavoidable; N = No Impact

ES.3 Project Alternatives

The following alternatives are analyzed in detail in Section 6.0, *Project Alternatives*, of this EIR. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation in the environmental review process. The alternatives considered to the proposed project are summarized below, followed by a discussion of the environmentally superior alternative.

ES.3.1 Alternatives Evaluated in Detail

ES.3.1.1 No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The "no project" analysis is required to discuss the existing conditions at the time the NOP is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project Alternative, the District would not implement any of the project components, including the demolition of the Miramar Hangar, which would remain in its current condition with no demolition, relocation, or rehabilitation. Under this alternative, no physical changes would occur on the project site. As the No Project Alternative would not demolish the existing Miramar Hangar and therefore would not involve the necessary upgrades to Division of the State Architect (DSA) structural, access, and fire life safety standards, the Aviation Operations Program offered at Miramar College would cease operations, and the project site would be abandoned by the District. As such, this alternative is not considered feasible to implement consistent with DSA standards. However, in accordance with CEQA Guidelines Section 15126.6(e) the No Project Alternative is required to be evaluated.

ES.3.1.2 Reduced Ground Disturbance Alternative

The Reduced Ground Disturbance Alternative would modify the proposed project to lessen the extent of construction activity in the southern portion of the project site, which would reduce potential impacts to biological resources and paleontological resources. Under this alternative, the District would redesign the project footprint to avoid or minimize grading, excavation, and paving within the southern parking area. By reducing ground disturbance, this alternative would decrease the likelihood of direct impacts to biological resources, including habitat used by special status species that were identified as having moderate potential to occur on the site. In addition, this alternative would reduce the potential to uncover or disturb previously unidentified paleontological resources. Although this alternative would continue to achieve the project objectives, reducing the southern parking area could constrain on-site circulation, parking capacity, and staging areas needed during construction.

ES.3.2 Comparative Environmental Analysis

Detailed analysis of each alternative is provided in Section 6.0, *Project Alternatives*, of this EIR. Table ES-2, *Comparison of Project and Alternatives Impacts*, provides a comparative summary of the project and alternatives with the purpose of highlighting whether each alternative would result in a similar, greater, or lesser impact than the project.

Table ES-2
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS

Issue Areas with Potential for Significant Impacts under the Project	Project	Alternatives	
		No Project Alternative	Reduced Ground Disturbance Alternative
Biological Resources			
Special-Status Species	LTSM	NI	LTSM<
Cultural Resources			
Historic Resources	SU	NI	SU
Geology and Soils			
Paleontological Resources	LTSM	NI	LTSM<
Land Use and Planning			
Conflict with an Applicable Land Use Plan	SU	NI	SU
Noise			
Increase in Ambient Noise Levels	LTSM	NI	LTSM=
Ground-Borne Vibration	LTSM	NI	LTSM=
Airport Noise Exposure	LTSM	NI	LTSM=

SU = significant and unavoidable impacts; LTSM = less than significant impacts with mitigation; LTS = less than significant impacts; NI = No Impact
< represents comparatively reduced impact relative to the project (if impact designation is the same and impact varies)
> represents comparatively greater impact relative to the project (if impact designation is the same and impact varies)
= represents same/similar impacts relative to the project

ES.3.3 Environmentally Superior Alternative

An EIR is required to identify an environmentally superior alternative among the alternatives analyzed. The environmentally superior alternative is typically the alternative having the fewest significant environmental impacts or having the greatest ability to avoid or substantially reduce significant environmental impacts associated with the project. If the No Project Alternative is identified as the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) also requires that the EIR identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives (refer to Table ES-2), the No Project Alternative is identified as the Environmentally Superior Alternative. The No Project Alternative would eliminate the project's significant and unavoidable impact associated with historic resources and land use plan conflicts. The severity of the impacts that were determined to be less than significant with mitigation under this alternative would be eliminated compared to the impacts of the project. The No Project Alternative would result in no facility upgrades to meet current DSA requirements and the Aviation Operations Program at Miramar College would cease operations. As such, the No Project Alternative would not fulfill any of the project objectives.

Since the No Project Alternative is selected as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives in accordance with CEQA Guidelines Section 15126.6(e)(2). The remaining alternative is the Reduced Ground Disturbance Alternative. Under this alternative, significant and unavoidable impacts associated with historic resources and land use plan and policy conflicts would remain. Impacts related to special-status species and paleontological resources that were determined to be less than significant with mitigation under this alternative would be similar but slightly reduced compared to the impacts of the project, while the

impacts related to noise that were determined to be less than significant with mitigation would be similar. The Reduced Ground Disturbance Alternative would achieve each of the identified project objectives.

ES.4 Issues to Be Resolved

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The issues to be resolved by the decision makers for the proposed project include the choice among alternatives and whether or how to mitigate the significant effects. Table ES-1, above, identifies potential environmental effects of the proposed project and feasible mitigation measures that could reduce or avoid the identified environmental impacts. Section ES.5, *Project Alternatives*, below describes potential alternatives to the project that avoid or reduce environmental impacts associated with the project.

The District decision makers must decide how to reduce significant and unavoidable environmental impacts of the project to the maximum extent feasible while achieving project objectives, through the adoption of mitigation measures and/or alternatives to the project identified in this EIR. If the proposed project is selected for adoption, the District Board of Trustees would be required to certify the Final EIR, determine whether and how to mitigate significant impacts, and adopt associated Findings and a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15091 for the significant and unavoidable cultural resources (historic resources) and land use (conflicts with adopted land use plans and policies) impacts identified in the EIR. In addition, the decision makers must determine if the potentially significant impacts associated with biological resources, cultural resources, geology and soils (paleontological resources), and noise have been mitigated below a level of significance. Lastly, the decision makers must determine whether the project alternatives would substantially reduce significant effects while still meeting key objectives of the project.

ES.5 Areas of Known Controversy

CEQA Guidelines Section 15123 requires that an executive summary of an EIR include areas of controversy known to the Lead Agency, including issues raised by other public agencies and/or the public. A Notice of Preparation (NOP) was circulated to solicit agency and public comments on the scope and content of the environmental analysis with a comment period from April 2, 2026 through May 4, 2026.

Comments received during the NOP public scoping period were considered as part of the preparation of this EIR. Comments addressed topics including cultural and tribal cultural resources, vector breeding minimization, hazards and hazardous materials, biological resources, greenhouse gas emissions, utilities and service systems, and potential glare impacts. A copy of the NOP and comments received during the NOP review period are contained in Appendix A of the EIR.

1.0 INTRODUCTION

This Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with construction and operation of the proposed San Diego Miramar College Aviation Instructional Center at Montgomery-Gibbs Executive Airport Project (Miramar College AIC Project or project). The project involves the demolition of an existing hangar and construction of an expanded and modernized hangar for use by the Aviation Operations Program offered at Miramar College. The project would be operated pursuant to a new ground lease between the San Diego Community College District (District) and the City of San Diego (City). The project site is located on the southwestern portion of Montgomery-Gibbs Executive Airport (referred to as the "Airport" or by its Federal Aviation Administration [FAA] identifier "MYF") at 3873 Kearny Villa Road in the City. Refer to Section 2.0, *Project Description*, for further discussion of the proposed project site and components.

1.1 Purpose of the EIR

The District is the Lead Agency for the project under the California Environmental Quality Act (CEQA) and has determined that an EIR is required for the proposed project. Preparation of an EIR is required when it can be fairly argued, based on substantial evidence, that a proposed project may result in a significant environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental impacts of a project, identify possible ways to minimize the significant impacts, and describe reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. The mitigation measures that are specified herein shall be adopted as conditions of approval of the project to minimize the significance of impacts resulting from the implementation of the project. In addition, this EIR is the primary reference document in the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) for the project. Public agencies are required to consider the information presented in an EIR when determining whether to approve a project.

This EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.); the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines; California Code of Regulations [CCR], Title 14, Section 15000 et seq.); and the rules, regulations, and procedures for implementation of CEQA.

This EIR is an informational document prepared by the District for the following purposes:

- To satisfy the requirements of CEQA (PRC Section 21000 et seq.) and the CEQA Guidelines (CCR Title 14, Section 15000 et seq.).

- To inform the general public, the local community, and Responsible, Trustee and other interested public agencies of the scope of the project, the potential environmental effects of the project, measures to mitigate potentially significant environmental effects, and alternatives to the project.

- To provide the District information to consider potential environmental consequences in deciding whether to approve the project.

- To serve as a source document for Responsible and Trustee agencies to issue permits and approvals, if required, for development of the project.

As described in CEQA and the CEQA Guidelines, public agencies are charged with the duty of avoiding or substantially lessening significant environmental effects where feasible. In satisfying this duty, a public agency has an obligation to balance a project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. The Lead Agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the project. Further, CEQA requires the District to consider the information in the EIR and make findings regarding any significant and unavoidable effects identified in the EIR. The District will review and consider certification of the Final EIR prior to any decision on whether to approve the proposed project.

This EIR has been prepared utilizing information from District and City planning and environmental documents, technical studies prepared for the project, and other publicly available data. As permitted under the CEQA Guidelines (Section 15084[d-e]), this EIR has been prepared by a consultant under the direction of District staff. However, prior to certification, the District has undertaken an independent review of this EIR by having District staff work with the consultant on the EIR. If certified by the District Board of Trustees, the information included, and the conclusions reached in the EIR will therefore represent the District's independent judgment as the Lead Agency regarding the potential environmental impacts of the project. In addition, the City of San Diego is a Responsible Agency for the proposed project pursuant to CEQA Guidelines Section 15381 and would utilize the EIR to support discretionary approvals within their purview.

1.2 Environmental Review Process

1.2.1 Notice of Preparation

In accordance with CEQA Guidelines Section 15082, after deciding that an EIR is required, the Lead Agency must file a Notice of Preparation (NOP) with the Office of Planning and Research (OPR) State Clearinghouse (SCH), and the NOP must be posted at the County Clerk's office for at least 30 days. The NOP is provided to solicit input on the scope of the EIR from Responsible and Trustee agencies, other concerned agencies or organizations, and interested parties.

The NOP was mailed to a distribution list consisting of relevant local agencies and submitted to the SCH for distribution to Responsible, Trustee, and other relevant state agencies. The NOP was also published in the San Diego Union Tribune newspaper and was made available electronically on the District Planning, Design, and Construction website. The 30-day comment period on the NOP commenced on April 2, 2026, and ended on May 4, 2026. Further discussion of the comments received is provided in Section 1.4.2 below, and a copy of the NOP and responses received are included in Appendix A of this EIR.

1.2.2 Public Review of the Draft EIR

A Draft EIR must contain information required by CEQA Guidelines Sections 15122 through 15131, including: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) consideration of and discussion of environmental impacts (direct, indirect, cumulative, growth-inducing, and unavoidable impacts); f) discussion of alternatives to the proposed project; g) mitigation

measures; and h) discussion of irreversible changes. As described further in Section 1.3, *Organization of the EIR*, this information is provided within the EIR for consideration during the public review process and by the Lead Agency.

Pursuant to CEQA Guidelines Section 15105, the Draft EIR will be available for review and comment by the public and public agencies for a period of 45 days. The Notice of Availability for the Draft EIR has been distributed in accordance with CEQA Guidelines Section 15087. Interested agencies and members of the public are invited to provide comments to the District on the analysis and content of the Draft EIR. Public review of the Draft EIR is intended to focus "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines Section 15204).

Electronic comments are preferred and can be sent via email to SDCCDMeasureHH@sdccd.edu with the project name in the subject line. Comments may also be submitted by mail to the following address, provided they are postmarked no later than the close of the public review period:

Joel Peterson, PhD
Vice Chancellor, Executive Operations Officer
San Diego Community College District
3375 Camino Del Rio South, Suite 310
San Diego, CA 92108

The Draft EIR and related technical studies are available for review during the public review period on the District's website under the heading "Environmental Notices" at: https://www.sdccd.edu/departments/operations/construction/index.aspx, as well as at the District office at 3375 Camino Del Rio South, Suite 310, San Diego, California 92108.

1.2.3 Final EIR

Following the conclusion of the 45-day public review period for the Draft EIR, the District, as Lead Agency, will review comments received on the Draft EIR raising significant environmental issues per CEQA Guidelines Section 15088. Detailed responses to the comments received during public review will be provided in the Final EIR along with a Mitigation Monitoring and Reporting Program. Findings of Fact and a Statement of Overriding Considerations for impacts identified in the Draft EIR as significant and unavoidable will also be prepared as part of the EIR finalization process.

The culmination of the environmental review process will be a public hearing on the proposed project and its Final EIR. All agencies, organizations, and individuals who commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing. The Final EIR will need to be certified by the District Board of Trustees as having been prepared in compliance with CEQA prior to making decisions related to the project. The District Board of Trustees will also adopt all feasible mitigation measures identified in the EIR and apply them as conditions of project approval.

Responses to comments submitted on the Draft EIR by public agencies will be provided to those agencies at least 10 days prior to certification of the EIR. Public input is encouraged at all public hearings before the District Board of Trustees. The District Board of Trustees will also make findings regarding each significant environmental impact of the proposed project as identified in the Final EIR. For each significant impact of the project identified in the EIR, the Lead Agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of

the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental impacts, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

The Final EIR will need to be certified by the District as having been prepared in compliance with CEQA prior to deciding whether to approve or deny the proposed project. After the District certifies the Final EIR, it may then consider whether to approve the project. If the project is approved, the District will also adopt all feasible mitigation measures identified in the EIR and apply them as conditions of project approval.

1.2.4 Notice of Determination

The Lead Agency must file a Notice of Determination (NOD) after deciding to approve a project for which an EIR is prepared (CEQA Guidelines Section 15094). A local agency must file the NOD with the County Clerk within five working days after approval of the project by the Lead Agency. If the project requires discretionary approval from any state agency, then the local Lead Agency shall also file a copy of the NOD with the State Clearinghouse within 5 working days after project approval. The NOD must be posted for 30 days and retained by the Lead Agency for 12 months. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

1.2.5 Mitigation Monitoring and Reporting Program

PRC Section 21081.6 requires that the Lead Agency adopt an MMRP for any project for which it has adopted mitigation measures. An MMRP is intended to track compliance with the adopted mitigation measures during project implementation. If the project is approved, mitigation measures identified in the Final MMRP and included with the Final EIR must be implemented by the applicable parties identified in the MMRP and verified by the District.

1.3 Organization of the EIR

This EIR contains the information required to be included in an EIR by CEQA Guidelines Sections 15122 through 15131. In summary, the content and format of this EIR is as follows:

- **Executive Summary**, provides an overview of the EIR document in accordance with CEQA Guidelines Section 15123. The project, including its objectives, is described, and the location and regional setting of the project site is documented. In addition, the Executive Summary discloses the potential areas of controversy related to the project and identifies the potential alternatives to the proposed project as required by CEQA. Finally, the Executive Summary provides a summary of the project's impacts, mitigation measures, and conclusions.

- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the District in serving as the Lead Agency, an overview of the EIR format, and a description of environmental issues discussed in the EIR.

- **Section 2.0, Project Description**, serves as the EIR's Project Description for the purpose of fulfilling the requirements of CEQA Guidelines Section 15124 and contains a level of specificity commensurate with the level of detail proposed by the project. This section provides a detailed description of the project, including its purpose, main objectives, design features, construction characteristics, and operational characteristics expected over the project's lifetime, should development occur on the property. In addition, the discretionary actions required of the District and other government agencies to implement the project are discussed. The section also describes the environmental setting as required by CEQA Guidelines Section 15125, including descriptions of the project site's physical conditions and surrounding context used as the baseline for analysis in this EIR.

- **Section 3.0, Environmental Analysis**, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed project in accordance with CEQA Guidelines Sections 15126, 15126.2, and 15130. In the environmental analysis subsections of Section 3.0, the existing conditions pertinent to the subject area being analyzed are disclosed and accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed project. As applicable, impacts are evaluated on a direct, indirect, short-term, long-term, and cumulative basis. A conclusion concerning the significance of potential impacts is reached for each discussion, and mitigation measures are presented as warranted with a discussion of the significance of the potential impact with the implementation of the identified mitigation measures. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable impact, for which a Statement of Overriding Considerations would need to be adopted by the District pursuant to CEQA Guidelines Section 15093. The analyses in Section 3.0 are based in part on technical reports appended to this EIR.

- **Section 4.0, Effects Found Not to be Significant**, includes a discussion of the potential environmental effects found not to be significant and that, therefore, do not require a detailed evaluation in this EIR. This section fulfills the requirements of CEQA Guidelines 15128. Other effects found not to be significant are summarized in the applicable subsections of Section 4.0.

- **Section 5.0, Other CEQA-Required Sections**, includes specific topics that are required by CEQA Guidelines Section 15126 but not covered in Section 4.0. These include a summary of the project's significant and unavoidable impacts, a discussion of the significant and irreversible environmental changes that would occur if the project is implemented, and potential growth-inducing aspects of the proposed project.

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed project that could reduce or avoid the project's significant environmental effects in accordance with CEQA Guidelines Section 15126.6. CEQA does not require an EIR to consider every conceivable alternative to the project but rather to consider a reasonable range of alternatives to foster informed decision making and public participation. Three alternatives, including the CEQA-required No Project Alternative, are evaluated in detail in Section 6.0.

- **Section 7.0, Individuals and Agencies Consulted**, lists the persons who authored or participated in preparing this EIR pursuant to CEQA Guidelines Section 15129.

- **Section 8.0, References,** provides a list of the reference material used in preparation of this EIR.

1.4 Scoping Process

1.4.1 Effects Found Not Significant

The District concluded that the project would have no impact or a less than significant impact related to agriculture and forestry resources, mineral resources, population and housing, and recreation, and that no further analysis of these topics is required in the EIR. Refer to Section 4.0, *Effects Found Not to be Significant*, for a discussion of these topical issues.

1.4.2 NOP Responses

The project NOP was made available for a comment period from April 2, 2026, to May 4, 2026. The District received six responses to the NOP, which are summarized in Table 1-1, *NOP Comment Summary*, along with notes regarding where the CEQA-related issues raised are addressed in this EIR. A copy of the NOP and responses received are included in Appendix A of this EIR.

Table 1-1
NOP COMMENT SUMMARY

Commenter	Date	Comment Summary	Location Addressed in the EIR
Native American Heritage Commission (NAHC)	April 2, 2026	The NAHC provided a summary of the CEQA requirements related to cultural resources and tribal cultural resources and tribal consultation requirements. The NAHC recommended early consultation with traditionally and culturally affiliated tribes.	Refer to Section 3.4, *Cultural Resources*, and Section 3.14, *Tribal Cultural Resources*.
San Diego County Archaeological Society, Inc.	April 13, 2026	The San Diego County Archaeological Society requested to be notified of the public review of the project's Draft EIR and the cultural resources technical report(s).	Refer to Section 3.4, *Cultural Resources.*
County of San Diego Department of Environmental Health and Quality, Vector Control Program	April 21, 2026	The County of San Diego Vector Control Program requested that the Draft EIR for the project address potential impacts from possible mosquito breeding sources created by the project and that the project be designed and constructed in a manner to minimize those impacts. The comment provided specific actions that the project should take to ensure that the project is designed, constructed, and maintained in compliance with applicable laws and regulations to prevent vector breeding.	Refer to Section 3.9, *Hydrology and Water Quality*.

Commenter	Date	Comment Summary	Location Addressed in the EIR
County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division	April 21, 2026	The County of San Diego Hazardous Materials Division noted project requirements related to hazardous materials that may need to occur, including a Hazardous Materials Questionnaire and a Hazardous Materials Plan Check review. The letter additionally outlined various federal, state, and local regulatory requirements related to the discovery and storage of hazardous waste on the project site.	Refer to Sections 3.8, *Hazards and Hazardous Materials.*
City of San Diego (City)	April 29, 2026	The City noted that as a Responsible Agency, they will determine whether all potential environmental impacts, mitigation measures, monitoring program(s), and findings have been properly addressed and adopted by the District prior to any discretionary actions taken by the City, including approval of the new ground lease. The letter noted that the project should address impacts within the City's right of way (ROW) and adjacent to the City's Multi-Habitat Planning Area (MHPA) in accordance with City policies. The letter additionally requests a discussion of existing and proposed utilities, mitigation and avoidance measures for cultural and tribal cultural resources, and a City Climate Action Plan (CAP) consistency analysis.	Refer to Section 2.0, *Project Description*, which includes a section referencing the ground lease and other discretionary and ministerial actions associated with the project. Refer to Section 3.0, *Environmental Analysis*, which includes a discussion of City policies, regulations, thresholds and potential impacts in City ROW where applicable. Refer to Section 3.3, *Biological Resources*, for a discussion of the adjacent MHPA, Section 3.15, *Utilities and Service Systems*, for a discussion of proposed and existing utilities, Section 3.4, *Cultural Resources*, and Section 3.14, *Tribal Cultural Resources*, for discussion of historical resource mitigation and avoidance measures, and Section 3.7, *Greenhouse Gas Emissions*, for a discussion of the City's CAP.
California Department of Transportation (Caltrans)	May 4, 2026	Caltrans noted they look forward to reviewing the project. Caltrans also noted that encroachment and/or transportation permits may be required for the project. The letter additionally noted that the proximity of the project site to State Route (SR) 163 raises some concerns regarding potential glare that could pose a potential risk to motorists traveling on SR-163.	Refer to Section 3.0, *Environmental Analysis*, for the project impact analyses and Section 3.1, *Aesthetics*, for a discussion of glare impacts. No improvements within Caltrans property are proposed and no Caltrans permits are anticipated to be required.

1.4.3 Potentially Significant Impacts of the Proposed Project

The NOP and comments received on the NOP were used to establish the scope of the issues addressed in this EIR. The District identified that additional project-level analysis was required to evaluate potential impacts associated with the implementation of the project for the following environmental issue areas. Section 3.0, *Environmental Analysis*, of this EIR provides the environmental analysis and outlines the mitigation program, where applicable, for each of the following topical issues.

- Aesthetics (Section 3.1)
- Air Quality (Section 3.2)
- Biological Resources (Section 3.3)
- Cultural Resources (Section 3.4)
- Energy (Section 3.5)
- Geology and Soils (Section 3.6)
- Greenhouse Gas Emissions (Section 3.7)
- Hazards and Hazardous Materials (Section 3.8)
- Hydrology and Water Quality (Section 3.9)
- Land Use and Planning (Section 3.10)
- Noise (Section 3.11)
- Public Services (Section 3.12)
- Transportation (Section 3.13)
- Tribal Cultural Resources (Section 3.14)
- Utilities and Service Systems (Section 3.15)
- Wildfire (Section 3.16)

1.5 Responsible and Trustee Agencies

Responsible Agencies include public agencies other than the Lead Agency which have discretionary approval power over a project. Trustee Agencies are state agencies with jurisdiction by law over natural resources affected by a proposed project that are held in trust of the people of the State of California. The analysis and findings in this EIR reflect the independent judgment of the District; however, pursuant to CEQA Guidelines Section 15381 and Section 15386, Responsible and Trustee Agencies may use this EIR to fulfill their requirements for environmental review of their discretionary actions for the project. Responsible and Trustee agencies would determine whether all potential environmental impacts, mitigation measures, monitoring program(s), and findings have been properly addressed and adopted by the Lead Agency (the District) prior to any discretionary actions are undertaken.

2.0 PROJECT DESCRIPTION

This section provides a brief background of the project and a detailed description of the project and its environmental setting, pursuant to CEQA Guidelines Sections 15124 and 15125, respectively. This includes a description of the project location, geographic setting, environmental setting, project objectives, project components, and discretionary actions required to implement the project. This project description is used as the basis for analyzing the project's potential impacts on the existing physical environment in Section 3.0, *Environmental Analysis*, of this EIR.

2.1 Project Location

The project site is located at 3873 Kearny Villa Road within the Kearny Mesa Community Plan area in the central portion of the City of San Diego (City), San Diego County (County), California. Refer to Figure 2-1, *Regional Location*. The proposed project site is generally located north of Aero Drive, south and east of State Route (SR) 163 and Kearny Villa Road, and west of Interstate (I-) 15 and Ruffin Road. The project is proposed on a 1.06-acre site that is currently comprised of the 6,300 square foot (SF) Miramar Hangar, surface parking, and gravel and paved areas used for aircraft and engine testing as discussed further in Section 2.2 below. Refer to Figure 2-2, *Aerial Photograph*.

The project site is located in the southwest quadrant of the Montgomery-Gibbs Executive Airport (referred to as the "Airport" or by its Federal Aviation Administration [FAA] identifier "MYF") which is owned and operated by the City Airports Division as a general aviation airport. MYF is located north of Aero Drive, east of SR 163, south of Balboa Avenue, and west of Ruffin Road. The project site is additionally located within the community of Kearny Mesa, which is approximately 4,400 acres and is bound by SR 52 to the north, I-805 to the west, I-15 to the east, and properties lying to the south of Aero Drive and along the western edge of I-15 to the south. MYF occupies over 550 acres of the Kearny Mesa community.

Land uses surrounding the project site include SR 163, the San Diego Police Department Air Support Unit building, the Spiders Aircraft Services Inc. building, and undeveloped areas associated with MYF to the north, a hotel and recreational space to the south, San Diego Fire-Rescue Department (SDFD) Station 28 to the southwest, Kearny Villa Road and SR 163 to the west, and MYF runways, taxiways, and associated structures to the east. Refer to Figure 2-2.

2.2 Project Background and History

Approximately 0.42 acre of the project site has been leased to the District by the City since 1984 for use by the Aviation Operations Program offered through Miramar College. The District is a community college district which includes three credit colleges (San Diego City College, Mesa College, and Miramar College) and the state's only free-standing noncredit college (San Diego College of Continuing Education). The District is the third largest public community college district in California, serving approximately 90,000 students annually across the four colleges. During the 2024-2025 academic year, Miramar College served approximately 8,591 full-time students and a total annual headcount of 25,387 students (District 2025).

The Aviation Operations Program is offered through the Miramar College campus, which integrates simulator flight training with academic study and emphasizes a combination of the technical

fundamentals of flight, airport operations, human factors, group dynamics, and safety. Miramar College's Aviation Operations Program meets all requirements of the FAA Part 141 Pilot Ground School. While the Aviation Operations Program does not offer flight training, the program includes all required ground training and flight simulator labs. Aviation Operations Program courses are offered both on the Miramar College campus and off campus at the project site, also known as the Montgomery Field Aviation Classroom. The Montgomery Field Aviation Classroom hosts approximately 13 class sessions per week, each containing approximately 15 to 35 students and one to two faculty members. Daytime and evening courses are offered through this program. Courses at the Montgomery Field Aviation Classroom involve instruction within the Miramar Hangar and on the eastern portion of the site where hands-on engine testing instruction occurs.

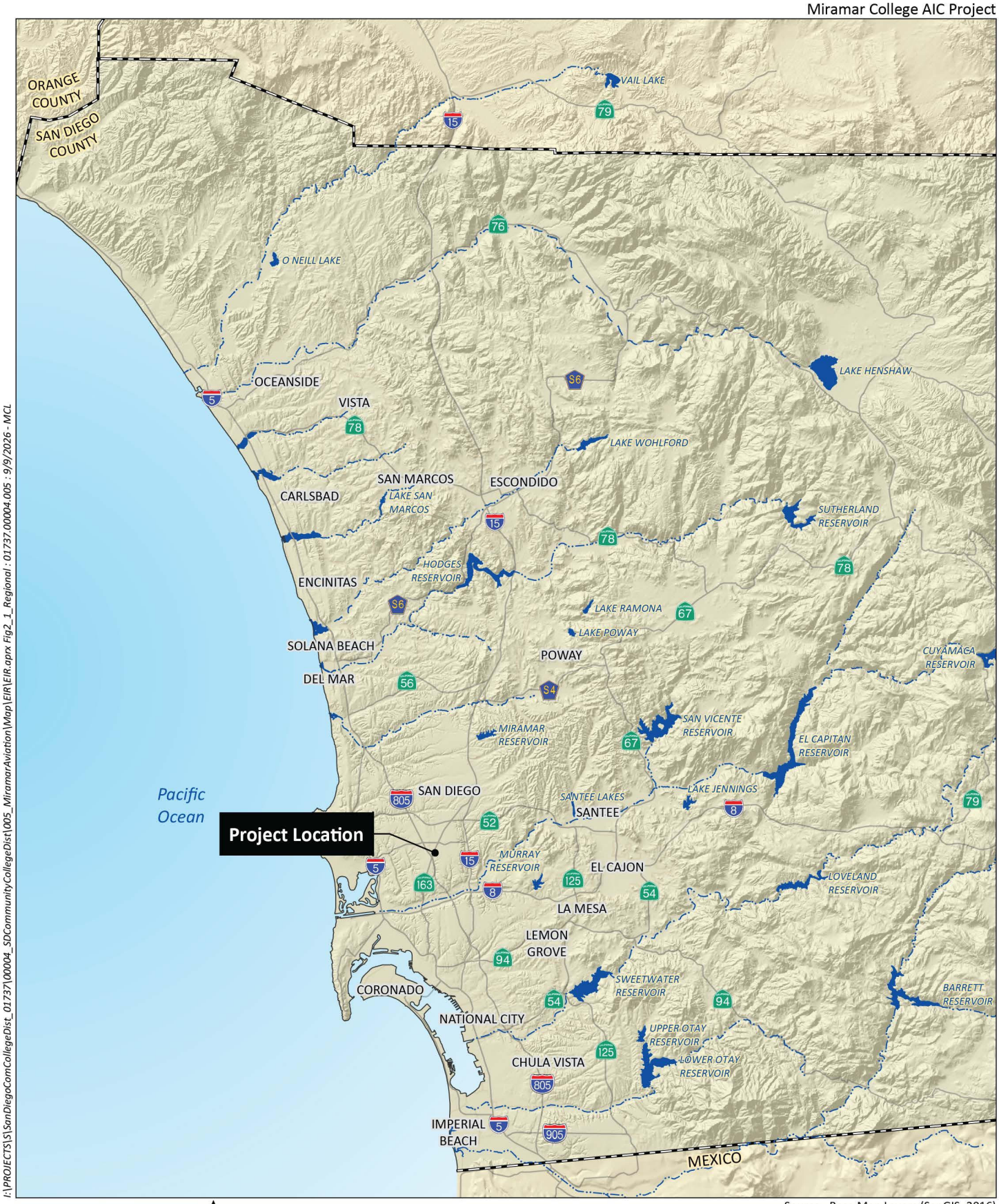
In 2017, the City began developing an update to the Montgomery-Gibbs Executive Airport Master Plan (AMP) to determine the extent, type, and schedule of development needed based on current projections. An AMP presents the community and airport's vision for a 20-year strategic development plan based on the forecast of activity and is used as a decision-making tool and is intended to complement other local and regional plans. The Draft AMP for MYF identifies existing and future conditions, an Airport Layout Plan (ALP), and a schedule of priorities and funding sources for proposed improvements. The ALP graphically depicts planned development at the airport within the 20-year planning period of the Draft AMP (Figure 2-3, *Draft MYF Airport Layout Plan)*. The existing Miramar Hangar that is located on the project site is identified as existing Building 8, Large Box Hangar. The ALP identifies the southern portion of the project site as an area for future development of hangars during the long-term phase of airport development under the Draft AMP (11-20 years). As shown on Figure 2-3, the southernmost portion of the project site would overlap with the project site for project 3-8 identified on the Draft ALP, which includes the construction of additional hangars. However, construction of the project's southern parking area would not be within the building footprint of these hangars.

In October 2025, the City, as Lead Agency, released the draft Montgomery-Gibbs Executive Airport Master Plan Program Environmental Impact Report (PEIR; SCH No. 20190209034) for public review (City 2025). As described in the PEIR, Building 8 along with two adjacent buildings, 6 and 7, were evaluated for their historic potential and were determined to be eligible for listing in the San Diego Register of Historic Resources, the California Register of Historical Resources (CRHR), and the National Register of Historic Places (NRHP). Because of their historic status, the Draft AMP and PEIR determined that these hangars would be retained in their current state (City 2025).

The District, as Lead Agency, is required to satisfy the requirements of CEQA (PRC Section 21000 et seq.) and the CEQA Guidelines (CCR Title 14, Section 15000 et seq.) for discretionary actions proposed on the project site. As discussed further in Section 2.5, *Project Components,* below, the project would involve the demolition of the Miramar Hangar (Building 8). As the proposed project would deviate from the Draft AMP and underlying assumptions of the analysis contained in the PEIR and the PEIR for the Draft AMP has not been certified, the project would not meet the requirements outlined in CEQA Guidelines Section 15152 and 15168 that would allow for tiering from the City's Draft AMP PEIR for MYF.

2.3 Environmental Setting

The existing conditions at the project site are described briefly here. More detailed descriptions of the environmental setting related to individual environmental issue areas are provided in the applicable subsections of Section 3.0, *Environmental Analysis*. In accordance with Section 15125 of the CEQA



I:\PROJECTS\S\SanDiegoComCollegeDist_01737\00004_SDCommunityCollegeDist\005_MiramarAviation\Map\EIR\EIR.aprx Fig2_1_Regional : 01737.00004.005 : 9/9/2026 - MCL

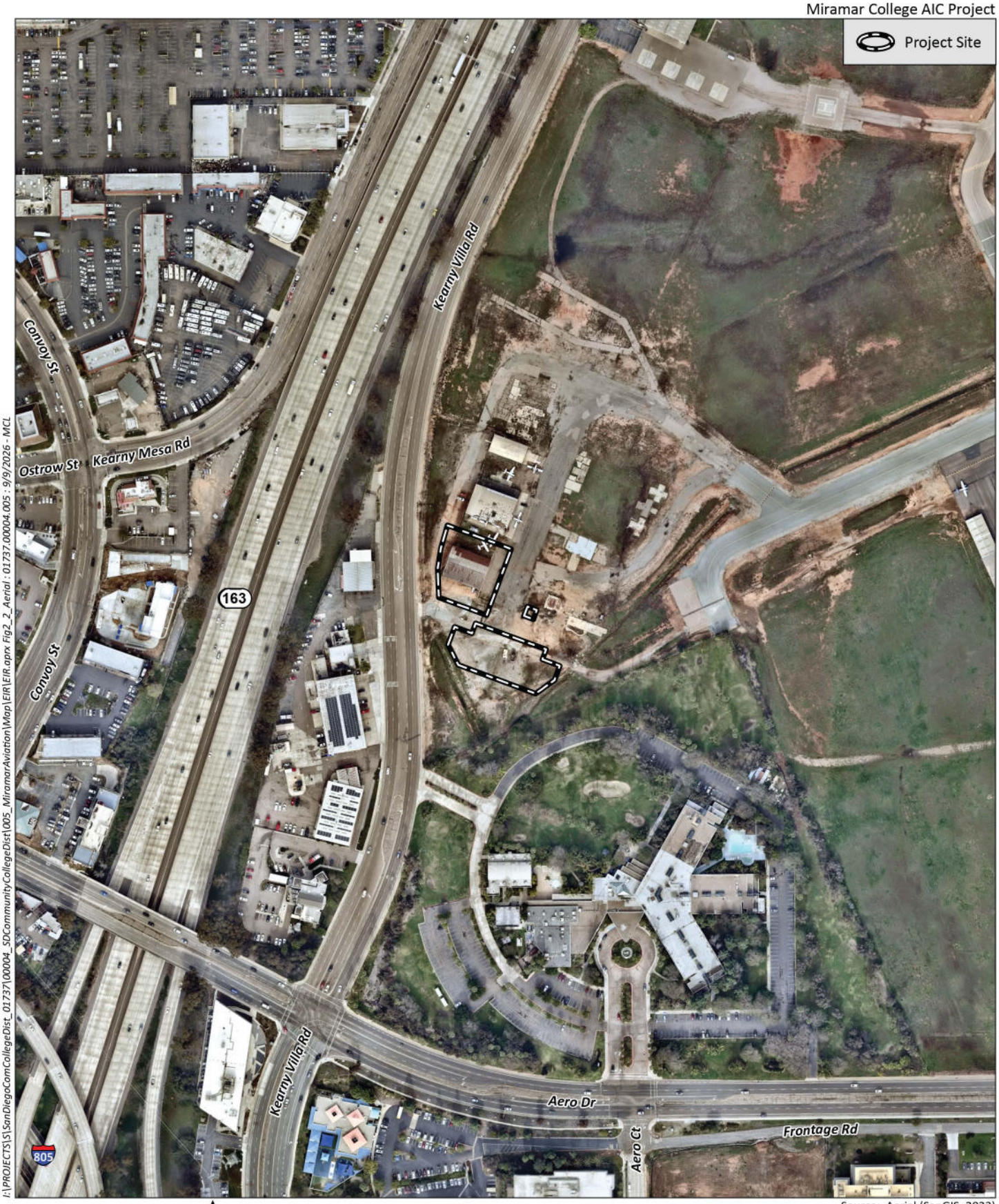
0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 2-1



I:\PROJECTS\S\SanDiegoComCollegeDist_01737\00004_SDCommunityCollegeDist\005_MiramarAviation\Map\EIR\EIR.aprx Fig2_2_Aerial : 01737.00004.005 : 9/9/2026 - MCL

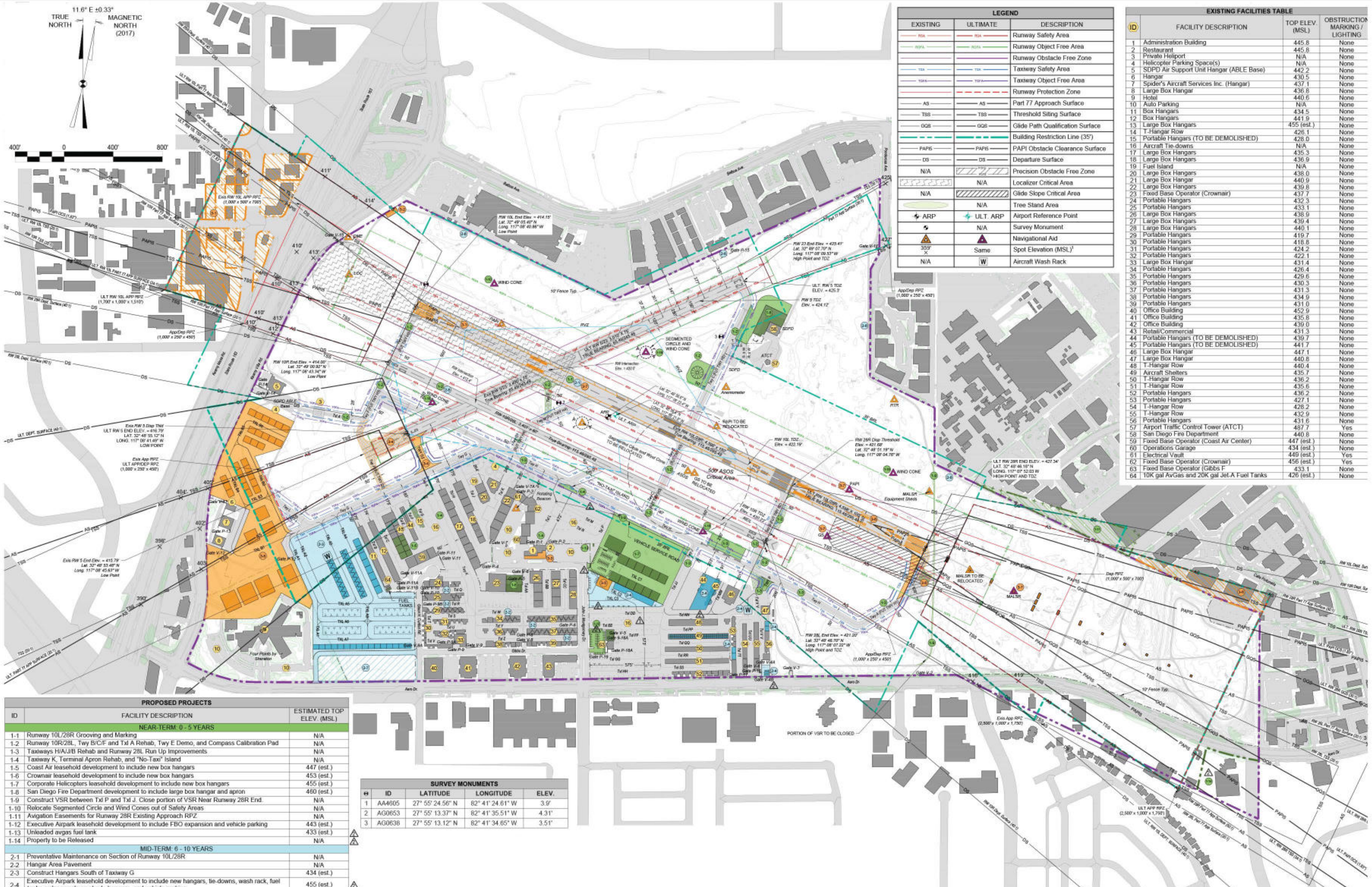
0 300 Feet

Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Aerial Photograph

Figure 2-2



LEGEND		
EXISTING	ULTIMATE	DESCRIPTION
RSA	RSA	Runway Safety Area
ROFA	ROFA	Runway Object Free Area
		Runway Obstacle Free Zone
TSA	TSA	Taxiway Safety Area
TOFA	TOFA	Taxiway Object Free Area
		Runway Protection Zone
AS	AS	Part 77 Approach Surface
TSS	TSS	Threshold Siting Surface
GQS	GQS	Glide Path Qualification Surface
		Building Restriction Line (35')
PAPIS	PAPIS	PAPI Obstacle Clearance Surface
DS	DS	Departure Surface
N/A		Precision Obstacle Free Zone
	N/A	Localizer Critical Area
N/A		Glide Slope Critical Area
	N/A	Tree Stand Area
ARP	ULT. ARP	Airport Reference Point
	N/A	Survey Monument
		Navigational Aid
359' ×	Same	Spot Elevation (MSL)[1]
N/A	W	Aircraft Wash Rack

EXISTING FACILITIES TABLE			
ID	FACILITY DESCRIPTION	TOP ELEV. (MSL)	OBSTRUCTION MARKING / LIGHTING
1	Administration Building	445.8	None
2	Restaurant	445.8	None
3	Private Heliport	N/A	None
4	Helicopter Parking Space(s)	N/A	None
5	SDPD Air Support Unit Hangar (ABLE Base)	442.2	None
6	Hangar	430.5	None
7	Spider's Aircraft Services Inc. (Hangar)	437.1	None
8	Large Box Hangar	436.8	None
9	Hotel	440.6	None
10	Auto Parking	N/A	None
11	Box Hangars	434.5	None
12	Box Hangars	441.9	None
13	Large Box Hangars	455 (est.)	None
14	T-Hangar Row	426.1	None
15	Portable Hangars (TO BE DEMOLISHED)	428.0	None
16	Aircraft Tie-downs	N/A	None
17	Large Box Hangars	435.3	None
18	Large Box Hangars	436.9	None
19	Fuel Island	N/A	None
20	Large Box Hangars	438.0	None
21	Large Box Hangar	440.9	None
22	Large Box Hangars	439.8	None
23	Fixed Base Operator (Crownair)	437.7	None
24	Portable Hangars	432.3	None
25	Portable Hangars	433.1	None
26	Large Box Hangars	438.9	None
27	Large Box Hangars	439.4	None
28	Large Box Hangars	440.1	None
29	Portable Hangars	419.7	None
30	Portable Hangars	418.8	None
31	Portable Hangars	424.2	None
32	Portable Hangars	422.1	None
33	Large Box Hangar	431.4	None
34	Portable Hangars	426.4	None
35	Portable Hangars	429.6	None
36	Portable Hangars	430.3	None
37	Portable Hangars	431.3	None
38	Portable Hangars	434.9	None
39	Portable Hangars	431.0	None
40	Office Building	452.9	None
41	Office Building	435.8	None
42	Office Building	439.0	None
43	Retail/Commercial	431.3	None
44	Portable Hangars (TO BE DEMOLISHED)	439.7	None
45	Portable Hangars (TO BE DEMOLISHED)	441.7	None
46	Large Box Hangar	447.1	None
47	Large Box Hangar	440.8	None
48	T-Hangar Row	440.4	None
49	Aircraft Shelters	435.7	None
50	T-Hangar Row	436.2	None
51	T-Hangar Row	435.6	None
52	Portable Hangars	436.2	None
53	Portable Hangars	427.1	None
54	T-Hangar Row	428.2	None
55	T-Hangar Row	432.9	None
56	Portable Hangars	431.6	None
57	Airport Traffic Control Tower (ATCT)	487.7	Yes
58	San Diego Fire Department	440.8	None
59	Fixed Base Operator (Coast Air Center)	447 (est.)	None
60	Operations Garage	434 (est.)	None
61	Electrical Vault	449 (est.)	Yes
62	Fixed Base Operator (Crownair)	456 (est.)	Yes
63	Fixed Base Operator (Gibbs F	433.1	None
64	10K gal AvGas and 20K gal Jet-A Fuel Tanks	426 (est.)	None

PROPOSED PROJECTS			
ID	FACILITY DESCRIPTION	ESTIMATED TOP ELEV. (MSL)	
	NEAR-TERM: 0 - 5 YEARS		
1-1	Runway 10L/28R Grooving and Marking	N/A	
1-2	Runway 10R/28L, Twy B/C/F and Txl A Rehab, Twy E Demo, and Compass Calibration Pad	N/A	
1-3	Taxiways H/A/J/B Rehab and Runway 28L Run Up Improvements	N/A	
1-4	Taxiway K, Terminal Apron Rehab, and "No-Taxi" Island	N/A	
1-5	Coast Air leasehold development to include new box hangars	447 (est.)	
1-6	Crownair leasehold development to include new box hangars	453 (est.)	
1-7	Corporate Helicopters leasehold development to include new box hangars	455 (est.)	
1-8	San Diego Fire Department development to include large box hangar and apron	460 (est.)	
1-9	Construct VSR between Txl P and Txl J. Close portion of VSR Near Runway 28R End.	N/A	
1-10	Relocate Segmented Circle and Wind Cones out of Safety Areas	N/A	
1-11	Avigation Easements for Runway 28R Existing Approach RPZ	N/A	
1-12	Executive Airpark leasehold development to include FBO expansion and vehicle parking	443 (est.)	
1-13	Unleaded avgas fuel tank	433 (est.)	⚠
1-14	Property to be Released	N/A	⚠
	MID-TERM: 6 - 10 YEARS		
2-1	Preventative Maintenance on Section of Runway 10L/28R	N/A	
2-2	Hangar Area Pavement	N/A	
2-3	Construct Hangars South of Taxiway G	434 (est.)	
2-4	Executive Airpark leasehold development to include new hangars, tie-downs, wash rack, fuel tanks, solar panels on shade hangars, and vehicle parking	455 (est.)	⚠
2-5	Airfield Lighting and Electrical Upgrades (Additional study required to site new electrical vault)	N/A	
2-6	Perimeter Fencing Improvements	Varies	
2-7	Reserved for Future Aeronautical Use	N/A	⚠
	LONG-TERM: 11-20 YEARS		
3-1	Runway 10L Non-Precision Markings and Avigation Easements for Future Approach RPZ	N/A	
3-2	Public Viewing Area	N/A	
3-3	Terminal Expansion Project	445	
3-4	Runway 5 End Relocation and New Connector Taxiways	N/A	
3-5	Construct Large Conventional Hangar	455 (est.)	⚠
3-6	Runway 28R Threshold Relocation (Taxiway A Fillet), Reduce Runway Width to 100 FT, and Avigation Easements for Future Approach RPZ	N/A	
3-7	Runway 28R Threshold Relocation (NAVAID and MALSR Relocation)	N/A	
3-8	Construct Hangars in Spiders Area	445 (est.)	

SURVEY MONUMENTS				
#	ID	LATITUDE	LONGITUDE	ELEV.
1	AA4605	27° 55' 24.56" N	82° 41' 24.61" W	3.9'
2	AG0653	27° 55' 13.37" N	82° 41' 35.51" W	4.31'
3	AG0638	27° 55' 13.12" N	82° 41' 34.65" W	3.51'

LEGEND				
EXISTING	NEAR-TERM (0-5 YEARS)	MID-TERM (6-10 YEARS)	LONG-TERM (11-20 YEARS)	DESCRIPTION
				Buildings
				Pavement
		N/A	N/A	Fence
		N/A		Avigation Easement
N/A		N/A		Demolition
		N/A	N/A	Property Line

Notes:

1. Traverseway elevations are actual height MSL and do not include any adjustment. To calculate potential traverseway obstructions apply an adjustment of 23 feet for railways, 17 feet for interstate highways, 15 feet for other public roads, or 10 feet for private roads.
2. All taxiways provide the required 7.5 feet TESM for the critical aircraft.
3. The Building Restriction Line (BRL) shown assumes a height of 35 feet above ground level (AGL). Buildings less than 35 feet AGL could be positioned closer to the runways and buildings taller than 35 feet AGL will be required to be further from the runways.

Source: C&S Companies 2024

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Draft MYF Airport Layout Plan

Figure 2-3

Guidelines, the baseline conditions described herein reflect the environmental setting at the time the Notice of Preparation (NOP) was released in April 2026.

2.3.1 Airport Environment

The project site is located in the southwestern portion of MYF. MYF encompasses approximately 550 acres and is bound by Balboa Avenue to the north, Ruffin Road to the east, Aero Drive to the south, and Kearny Villa Road to the west. SR 163 runs north-south to the west and I-15 runs north-south to the east. MYF is classified by the FAA as a general aviation airport, which is defined as a public-use airport that does not have scheduled service or has less than 2,500 passenger boardings. Activities at MYF encompass all aviation except air carrier services (defined as engaging in air transportation interstate, overseas or the transportation of mail). The types of general aviation aircraft that operate at MYF include private, corporate, charter, air ambulance, law enforcement, fire rescue, flight training, and cargo. Landside facilities at MYF include the terminal building (including administrative offices and the restaurant), hotel, hangars (including the existing Miramar Hangar on the project site), parking lots, entrance roads, and support facilities, while airside facilities consist of three runways and 12 taxiways.

2.3.2 Existing Land Uses

The project site is within the Kearny Mesa Community Plan area with an Institutional land use designation. The City's General Plan classifies MYF as "unzoned" indicating that land uses are guided by the MYF Airport Land Use Compatibility Plan (ALUCP). The project site contains the Miramar Hangar on the northwestern portion of the site, which is an approximately 6,300 SF steel-frame aircraft hangar with a box-like massing and a gable end roof. The Miramar Hangar is one-story and approximately 28 feet and 6 inches tall. In addition, a gravel parking lot with a maximum of 40 spaces is located on the southern portion of the site. The eastern portion of the site is a graded, graveled area that contains various engine testing equipment used by the Aviation Operations Program.

The site is accessed from Kearny Villa Road by an asphalt paved road with a gate (MYF Gate 4) located near the southwestern corner of the Miramar Hangar. The gate and a chain link fence surround the western boundary of the project site which separates Kearny Villa Road from the Airport. The southern boundary of the project site is delineated by a chain link fence, which separates the project site from a disc golf course and a hotel. The northern boundary of the site is open to the hangar associated with Spiders Aircraft Services, Inc., while the eastern boundary of the site is open to the taxiways, open space, and structures associated with MYF. Refer to Figure 2-2.

As shown in Figure 2-3, the project site is located to the west of taxiway L and the nearest runway to the project site is Runway 5/23, which is approximately 1,200 feet northeast of the site. As described in the Draft AMP, the MYF runways and taxiways are surrounded by imaginary rectangular areas known as Runway Safety Areas, Runway Object Free Areas, Runway Obstacle Free Zones, Taxiway Safety Areas, Taxiway Object Free Areas, and Runway Protection Zones. The project site is located outside of these areas. In addition, the project site is located outside of the Building Restriction Line included on the ALP and is therefore not subject to the building height restriction of 35 feet. Under 14 CFR Part 77, the FAA defines "imaginary surfaces" around every public-use airport to protect navigable airspace. The project site is located within the Part 77 Approach Surface, the Threshold Siting Surface, and the Departure Surface which each extend from Runway 5/23. Refer to Figure 2-3.

2.3.3 Unique Features and Topography

The project site is generally flat, ranging from 400 feet above mean sea level (AMSL) at the north end to 405 feet AMSL at the southern end. Two upland-cut, stormwater swales occur to the south of the project site boundary which were created to collect stormwater runoff from developed portions of the airport.

2.3.4 Land Cover and Habitat

As described in Section 3.3, *Biological Resources*, a total of two vegetation communities (including land cover types) comprise the project site: disturbed habitat and developed land. No sensitive vegetation communities were identified in the project site boundary. Disturbed habitat covers the majority of the project site and includes land cleared of vegetation, land containing a preponderance of non-native plant species, or land showing signs of past or present animal usage that removes any capability of providing viable habitat. Developed portions of the project site consist of the existing hangar, access road, engine and aviation testing area, and parking area. The project site does not contain any potentially jurisdictional resources.

During the 2026 biological survey of the project area, a total of 23 plant species were observed, and a total of 20 animal species were detected (HELIX 2026a). No federally or state-listed plant species have been recorded within the project site, and no federally or state-listed or federal or state candidate animal species were detected on-site during project surveys. One federally listed endangered species, San Diego fairy shrimp (*Branchinecta sandiegonensis*), and one species proposed for federal listing as threatened, western spadefoot (*Spea hammondii*), have moderate potential to occur within the project site. In addition, although potential for burrowing owl (*Athene cunicularia*) to breed within the study area is low, there is moderate potential for wintering burrowing owls to periodically forage within the study area. One other sensitive animal species was documented to the south of the project site: Belding's orange-throated whiptail (*Aspidoscelis hyperythrus beldingi*). In addition, the project site contains suitable nesting habitat for several bird species, including raptors, protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG Code). See Section 3.3 and Appendix C for additional details.

2.3.5 Culturally and Historically Significant Resources

As discussed in Section 3.4, *Cultural Resources*, fifteen cultural resources have been identified within one mile of the project site, including three precontact archaeological sites, one precontact isolate, and 11 built environment resources. No archaeological resources were identified during the pedestrian survey conducted on the project site. A search of the Native American Heritage Commission (NAHC) Sacred Lands File was positive, and the Viejas Band of Kumeyaay Indians noted that the project area may "contain many sacred sites to the Kumeyaay people". Based on the results of the study, environmental factors, and the amount of modern development that has previously occurred within the airport boundaries, the archaeological sensitivity of the project site is considered low (HELIX 2026b). See Section 3.4 and Appendix E for additional details.

The existing Miramar Hangar (also referred to as Building 8) located in the northwestern portion of the project site was assembled on site between 1947 and 1950 using military surplus parts. The Miramar Hangar and the two buildings to the north (also referred to as Buildings 6 and 7) represent the early period of MYF (1947-1950), as the buildings housed businesses driving the development of the airport

and the subsequent growth of Kearny Mesa as an industrial and then residential/commercial community, thus possessing significance at the local level. See Figure 2-4, *Historic Hangars*. Therefore, the existing Miramar Hangar is eligible for listing in the NRHP, the CRHR, and San Diego Register of Historical Resources (SDRHR; HELIX 2026c). See Section 3.4 and Appendices D1 and D2 for additional details.

2.3.6 Rare and Unique Resources

As required by CEQA Guidelines Section 15125(c), the environmental setting should place special emphasis on resources that are rare or unique to that region and would be affected by the project. As discussed above, the project site contains sensitive biological and historical resources which could be considered rare or unique resources. Based on the existing conditions of the project site and surrounding area described above and discussed in more detail in Section 3.0, *Environmental Analysis*, the project site does not contain any other resources that are rare or unique to the region.

2.4 Project Objectives

CEQA Guidelines Section 15124(b) requires that an EIR contain a statement of the objectives sought by a project and states, "a clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations." The general purpose of the proposed project is to provide an expanded and modernized instructional facility for the Aviation Operations Program offered at Miramar College. The following specific objectives have been identified for the proposed project:

1. Expand and upgrade the existing instructional space to allow for segmented classroom, office, storage, pilot debrief, and air traffic control spaces to improve the student and faculty experience and provide for the anticipated growth of the Aviation Operations Program at Miramar College.

2. Meet regional workforce needs through the provision of an educational space that promotes high-quality hands-on aviation experience within an existing airport setting to prepare students for employment in an aviation-related career field.

3. Provide a modernized instructional space to align with current building codes related to structural integrity, safety, and accessibility.

4. Minimize the loss of instructional space and interruptions to the Aviation Operations Program during construction by providing an adequate off-site location for continued instruction.

5. Incorporate sustainability features to align with state climate targets and the California Community Colleges Chancellor's Office directives related to greenhouse gas emissions reduction, energy efficiency, resource conservation, and green building standards.

2.5 Project Components

2.5.1 Aviation Instructional Center

The project would involve the demolition of the existing 6,300 SF Miramar Hangar and construction of a new upgraded instructional facility, referred to as the Miramar College Aviation Instructional Center (AIC), and supporting facilities. The upgraded instructional facility would support the programs offered within the Aviation Operations Program at Miramar College, including the specific programs of Aircraft Maintenance, Pilot Training, and Air Traffic Control. The proposed Miramar College AIC would be approximately 18,000 SF and would be in the same general location as the existing hangar in the northwestern portion of the project site. To accommodate this upgraded instructional facility and the needs of the Aviation Operations Program, the project would additionally involve the expansion of the existing 0.42-acre lease area to 1.06 acres as further discussed in Section 2.5.5 below.

The expanded instructional facility would allow for an additional 15 class sessions per week to occur (three class sessions per day), for a total of 28 class sessions per week. Each class session would contain an average of 23 students. To comply with the ALUCP Safety Zone 2 requirements, the Miramar College AIC would establish a maximum capacity of 74 students and faculty at one time. Refer to Section 3.8.4.5 for additional information. The engine testing activity, which occurs on the eastern portion of the project site once a week under existing conditions, would occur twice a week in the same location to account for these additional class sessions. Class sessions would occur between 8:00 a.m. and 10:00 p.m. Monday through Friday, with the potential for special Saturday class sessions to occur.

The new Miramar College AIC building would be two stories and be a maximum height of 32 feet. Level 1 would include a lobby, a maintenance/hangar bay, two classrooms, offices, a custodial room, restrooms, and utility and storage rooms. In addition, trash enclosures, an air compressor, and a hazardous waste collection area would be located along the northern perimeter of Level 1. Level 2 would include one classroom, four pilot debrief rooms, air traffic control tower and en route training facilities, a conference room, break room, and restrooms. Refer to Figure 2-5, *Aviation Instructional Center Layout*.

The project would additionally include repaving the existing open-air storage area and engine testing pad on the eastern portion of the project site. Access would continue to be provided by the existing MYF Gate 4 east of Kearny Villa Road which would connect to a paved parking area located southeast of the new hangar. This parking area would provide approximately 70 parking spaces for students and faculty and would include nine electric vehicle (EV) ready spaces and seven EV charging spaces. An additional nine parking spaces would be provided along the southern perimeter of the proposed Miramar College AIC building which would include four Americans with Disabilities Act (ADA) accessible spaces and one EV charging station. Bicycle racks and secure bicycle storage lockers would be provided near the southeastern area of the Miramar College AIC building. Additional site improvements would include the addition of accessible paths of travel within the lease area. The fence located along the western boundary of the project site would remain in its existing location, and a new gate would be installed where the existing gate is located.

2.5.2 Utilities

The project would include the construction of connections to existing City-owned utility lines located in Kearny Villa Road to the west of the project site, including water and fire water. The project would



Building 6



Building 7



Building 8

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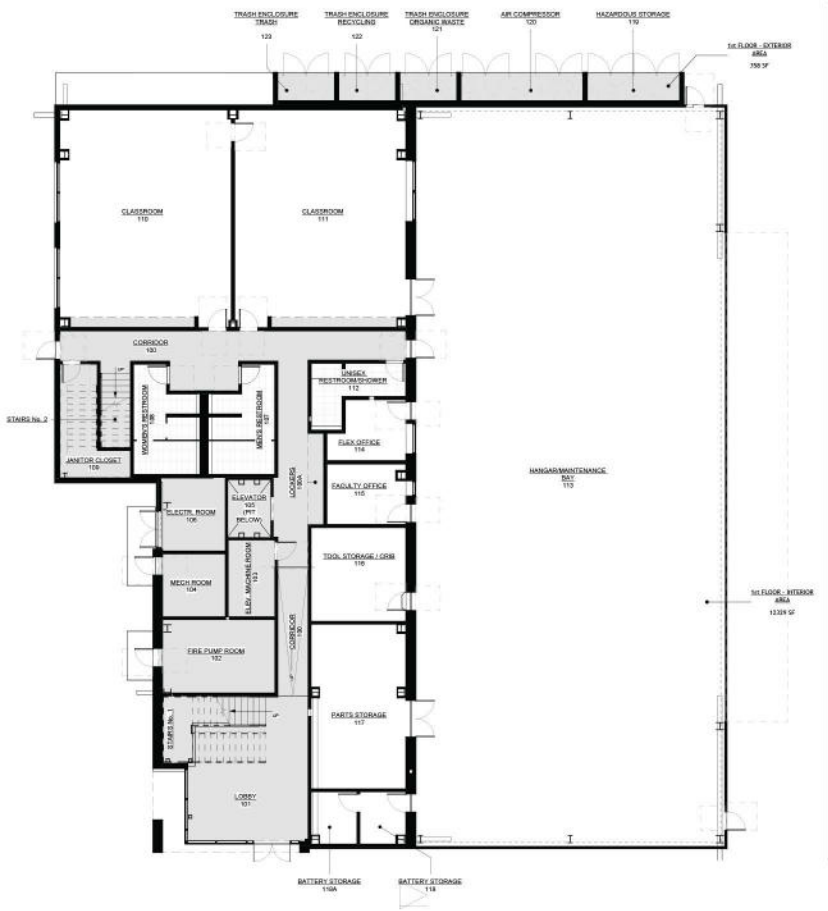

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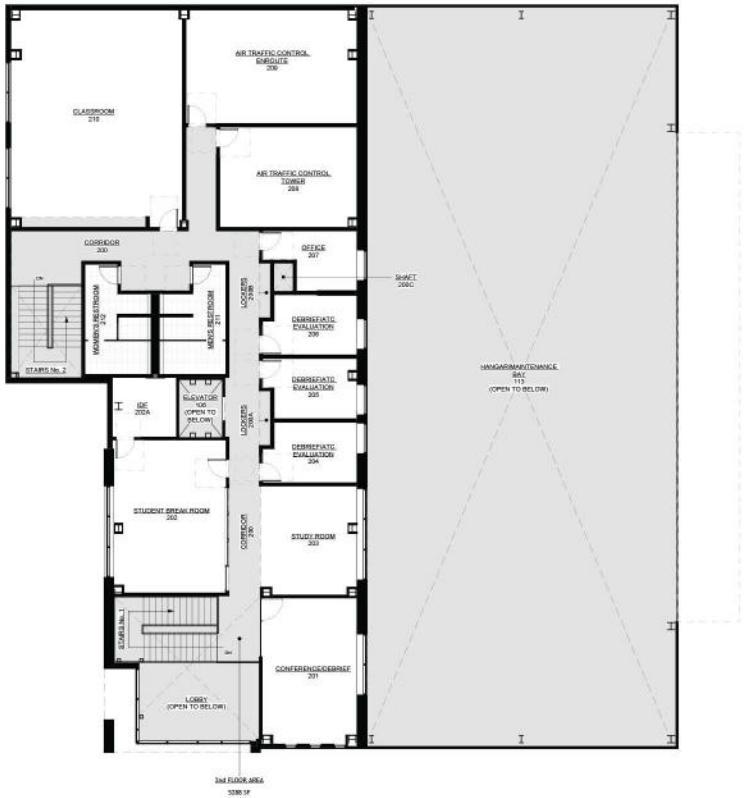

LEVEL 02



Source: Harper, 2026

HELIX Environmental Planning

Aviation Instructional Center Layout

Figure 2-5

involve the installation of a new sewer lateral to connect to an existing on-site sewer main located west of the proposed Miramar College AIC. In addition, the project would involve coordination with San Diego Gas and Electric (SDG&E) for new underground electric power lines which would connect to a new SDG&E transformer which would be installed on the western side of the proposed building. The project would not involve natural gas connections. The project would include the installation of a storm drain along the perimeter of the proposed Miramar College AIC building which would connect to a modular wetland system and underground vault located near the southwestern corner of the hangar. In addition, a storm drain would be constructed along the central portion of the parking lot which would connect to a modular wetland system and underground vault located in the western portion of the parking lot. The proposed modular wetland system would be designed in accordance with FAA policies that prohibit project features that could attract wildlife on airport property as discussed further in Section 3.8.4.5.

2.5.3 Sustainability

Consistent with the District Sustainability Levels framework, the proposed project would be designed to achieve the level of Certified/ Coast Live Oak (Sustainable Performance; refer to Section 3.5, *Energy*, for additional information). To achieve this performance level, the project would be an all-electric development and include features such as utilization of recycled construction materials, high-efficiency low-flow plumbing fixtures, and water-conserving appliances.

2.5.4 Project Construction

Construction is anticipated to begin in September 2027 and be completed in September 2028, with District courses resuming in the new facility in the Fall 2028 semester. The construction staging area would be located within the southern portion of the project site. During construction of the project, the District would continue aviation instruction at a temporary location that is yet to be determined.

2.5.5 New Ground Lease

To implement the project, the District would enter into a new long-term ground lease with the City of San Diego, with new lease terms and the lease area being expanded from the existing 0.42-acre ground lease area to 1.06 acres.

2.6 Intended Use of the EIR

Implementation of the proposed project would require a number of discretionary approvals. In accordance with CEQA Guidelines Section 15125(d), the EIR must describe the intended uses of the EIR, which include providing the District with the necessary information to decide whether to approve the proposed project as well as providing necessary information to other agencies with approval authority for the project. The District is the Lead Agency for the proposed project and has the primary approval authority related to the project. The following are the discretionary actions anticipated to be required by the District to implement the proposed project:

- Approval of Ground Lease with the City of San Diego;
- Approval of project plans from Division of the State Architect (DSA);
- Certification of the EIR;
- Adoption of an MMRP; and
- Adoption of CEQA Findings and Statement of Overriding Considerations.

Responsible Agencies and Trustee agencies are expected to review this EIR and determine whether all potential environmental impacts, mitigation measures, monitoring program, and findings have been properly addressed and adopted by the District as Lead Agency prior to any discretionary actions being taken. The following are the discretionary and ministerial actions anticipated to be required by other agencies to implement the proposed project:

- **Division of the State Architect**
  - Approval of project plans.

- **California State Water Resources Control Board**
  - General Construction Permit; and
  - Stormwater Pollution Prevention Plan (SWPPP).

- **City of San Diego Development Services Department**
  - Approval of Minor Right-of-Way Permit.

- **City of San Diego Airports Division**
  - Approval of long-term ground lease; and
  - Approval of ALP concept plan.

- **Federal Aviation Administration**
  - Approval of updated ALP;
  - Approval of Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) Notice of Proposed Construction or Alteration Form 7460-1; and
  - Approval of Categorical Exclusion or other applicable documentation in accordance with National Environmental Policy Act (NEPA) requirements.

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3.0 ENVIRONMENTAL ANALYSIS

In accordance with CEQA Guidelines Section 15126(a), the project impact analysis considers potential direct, indirect, short-term, long-term, and cumulatively considerable impacts that could occur from planning, constructing, and/or operating the proposed project.

Summary of EIR Scope

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared to determine the scope of environmental analysis for this EIR. The District distributed the NOP to public agencies and interested individuals and posted the NOP on its website to solicit input on the scope of study for the EIR. Taking known information and public comments into consideration, 16 primary environmental issue areas are evaluated in detail in this section of the EIR, while four issue areas were determined by the District to clearly have no potential to be significantly impacted by the project. The four environmental issue areas excluded from detailed analysis in this EIR are Agriculture and Forestry Resources, Mineral Resources, Population and Housing, and Recreation. These four subjects are discussed briefly in Section 4.0, *Effects Found Not to be Significant*. The 16 environmental issue areas evaluated in detail are listed below.

- Aesthetics (Section 3.1)
- Air Quality (Section 3.2)
- Biological Resources (Section 3.3)
- Cultural Resources (Section 3.4)
- Energy (Section 3.5)
- Geology and Soils (Section 3.6)
- Greenhouse Gas Emissions (Section 3.7)
- Hazards and Hazardous Materials (Section 3.8)
- Hydrology and Water Quality (Section 3.9)
- Land Use and Planning (Section 3.10)
- Noise (Section 3.11)
- Public Services (Section 3.12)
- Transportation (Section 3.13)
- Tribal Cultural Resources (Section 3.14)
- Utilities and Service Systems (Section 3.15)
- Wildfire (Section 3.16)

Sections 3.1 through 3.16 of this EIR provide an analysis of impacts for those environmental topics where it was determined that the project could result in “potentially significant impacts.” The format of discussion in Sections 3.1 through 3.16 of this EIR is standardized as much as possible in each section for ease of review. The environmental setting is discussed first, followed by applicable regulations, CEQA thresholds, and finally, a discussion of the potential environmental impacts that would result from implementation of the project (based on the specified thresholds of significance used as criteria to determine whether potential environmental effects are significant). Each topical section includes the following information:

- A description of the existing setting, including a discussion of the applicable regulatory framework
- Identification of thresholds of significance
- Analysis of potential project effects
- Evaluation of potential cumulative impacts

- Identification of project-specific mitigation measures, if required, to reduce the identified project impacts
- Identification of the level of significance of impacts after mitigation

Impact Analysis

Serving as the CEQA Lead Agency for this EIR, the District is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. The thresholds of significance used in this EIR take into consideration CEQA Guidelines Appendix G, adopted District policies, performance standards adopted, implemented, and monitored by regulatory agencies, including Responsible and Trustee agencies, and other significance standards recommended by regulatory agencies. Unless otherwise noted, the thresholds of significance that this document relies upon are the thresholds identified in Appendix G of the CEQA Guidelines. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

As required by CEQA Guidelines Section 15126.2(a), project-related direct, indirect, cumulative, short-term (temporary), and long-term (permanent) effects on the environment are considered in this EIR. The environmental changes identified throughout this EIR are referred to as "effects" or "impacts" interchangeably. Direct impacts are those that would occur directly as a result of the proposed project. Indirect impacts represent secondary effects that would result from project implementation. Cumulative effects are defined in CEQA Guidelines Section 15355 as "…two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts are described further in the introduction to the cumulative analysis provided below.

A summarized impact statement is provided following the analysis for each threshold. Where impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. For the impacts identified as significant and unavoidable, the District would be required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 if the District decides to approve the project despite its significant impact(s) to the environment. The Statement of Overriding Considerations would list the specific economic, legal, social, technological, and other benefits of the project, supported by substantial evidence in the project's administrative record, that outweigh the significant and unavoidable environmental impacts identified in the EIR.

Mitigation

Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the project. Following the mitigation measures identified to reduce potential impacts, a discussion of whether the identified mitigation measures would reduce impacts to below a level of significance is provided. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts below a level of significance. However, in some cases, feasible mitigation may not be available, and the EIR provides a discussion of the infeasibility to reduce potential impacts to explain a significant and unavoidable impact determination.

If the project proponent (the District) requests a modification, substitution, or change in timing for a mitigation measure because the mitigation measure as proposed proves to be impracticable or unworkable, the District may modify, substitute, or change the timing for the mitigation measure so long as: (1) the modification, substitution, or change in timing would achieve the same or greater reduction in potential impacts of the project as the original mitigation measure; (2) the modification, substitution, or change would not cause any impacts that were not otherwise analyzed in this EIR; and (3) the District publicly provides a legitimate reason for making the modification, substitution, or change in timing and supports the reason with substantial evidence. The District, in conjunction with any appropriate agencies or District departments, will determine the adequacy of any proposed modification, substitution, or change in timing and may refer its determination to the District Board of Trustees. The District will bear any costs associated with providing information that any department or decision-making body for the District requires to make the determination.

Identification of Cumulative Impacts

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project in addition to its project-specific impacts. As defined in CEQA Guidelines Section 15355:

> *'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *a) The individual effects may be changes resulting from a single project or a number of separate projects.*
>
> *b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

In accordance with CEQA Guidelines Section 15130(b), the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion is guided by the standards of practicality and reasonableness.

In addition, Section 15130(a) of the CEQA Guidelines requires that EIRs discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Therefore, the discussion of cumulative impacts in an EIR first evaluates whether the impacts of the project will be significant when considered in combination with past, present and future reasonably foreseeable projects. If a potentially significant cumulative impact would occur, the EIR considers whether the project would make a cumulatively considerable contribution to that cumulative impact. The CEQA Guidelines indicate that where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but shall briefly describe the basis for its conclusion. As further clarified by CEQA Guidelines Section 15065, "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The cumulative analysis contained in this EIR assumes that all mitigation measures identified in the preceding impact discussion to mitigate potential impacts of the project are adopted. Therefore, the cumulative impact discussion analyzes whether, after adoption of the identified mitigation measures, the remaining impacts of the project in combination with the impacts of related projects would cause a significant cumulative impact or whether the project would have a cumulatively considerable contribution to an existing or anticipated cumulative impact.

Two approaches for cumulative impact analysis are provided in CEQA Guidelines Section 15130(b) and are referred to herein as the "list method" and the "projections method." The list method evaluates cumulative impacts based on a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency. The projections method bases the cumulative impact analysis on a summary of projections contained in an adopted planning document that describes or evaluates conditions contributing to the cumulative effect.

This EIR primarily uses the projections method for cumulative analysis. The District is in the process of analyzing master plan frameworks for each of its four campuses and would implement the proposed project in addition to continuing to construct previously approved campus facilities associated with the four campuses, including Miramar College. As discussed further in Section 2.2, *Project Background and History*, the City has released an update to the Montgomery-Gibbs Executive Airport (MYF) Airport Master Plan (AMP) to determine the extent, type, and schedule of development needed based on current projections. The Draft AMP identifies planned development projects at the airport within the 20-year planning period which are additionally considered in the project's cumulative impact analysis. In addition, consideration of projects that could be implemented under adopted land use plans, such as the City of San Diego General Plan and Kearny Mesa Community Plan, is considered sufficient to account for cumulative impacts from future reasonably foreseeable projects outside of the MYF property. Therefore, the projections method is the primary approach taken in the cumulative analyses, especially where the geographic scope of cumulative analysis is regional or citywide.

The appropriate geographic scope for cumulative impact analysis varies depending upon the specific environmental issue area being analyzed. The geographic scope defines the study area within which projects may contribute to a specific cumulative impact. For some issue areas, the cumulative study area may address regional or area-wide conditions, while for other issue areas the potential for cumulative impacts is limited to localized effects. The geographic scope of analysis for each environmental issue area is also described within the cumulative impact analysis.

3.1 Aesthetics

This section addresses the potential aesthetics impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to aesthetics are also addressed.

3.1.1 Environmental Setting

3.1.1.1 Visual Character of the Project Site

The project site is located within the southwestern portion of the Kearny Mesa Community Plan area, within the boundaries of the Montgomery-Gibbs Executive Airport (MYF). The project site is located in the southwestern portion of MYF, west of the runways and adjacent and to the east of Kearny Villa Road. The project site contains the Miramar Hangar on the northwestern portion of the site, which is an approximately 6,300 square-foot (SF) single-story steel-frame aircraft hangar with a box-like massing and a gable end roof. In addition, a gravel parking lot with a maximum of 40 spaces is located on the southern portion of the site. The eastern portion of the site is an open space area comprised of gravel and graded soil which contains various engine testing equipment for use by the San Diego Miramar College Aviation Operations Program.

The project site is generally flat, ranging from 400 feet above mean sea level (AMSL) at the north end to 405 feet AMSL at the southern end. Two upland-cut, stormwater swales occur to the south of the project site boundary which were created to collect stormwater runoff from developed portions of the airport.

The site is accessed from Kearny Villa Road by an asphalt paved road with a gate (MYF Gate 4) located near the southwestern corner of the Miramar Hangar. The gate and a chain link fence surround the western boundary of the project site which separates Kearny Villa Road from the airport property. The southern boundary of the project site is delineated by a chain link fence which separates the project site from a disc golf course and a hotel. The northern boundary of the site is open to the hangar associated with Spiders Aircraft Services, Inc., while the eastern boundary of the site is open to the taxiways, open space, and structures associated with MYF.

3.1.1.2 Visual Character of Adjacent Land Uses

MYF runways and airport operations and structures are located directly adjacent to the north, east, and south of the project site. To the west of the project site is Kearny Villa Road, with San Diego Fire-Rescue Department (SDFD) Station 28, SDFD Emergency Command and Data Center, and the SDFD Repair Facility located to the west beyond Kearny Villa Road, between MYF and Interstate (I-) 805. MYF encompasses approximately 550 acres and is bound by Balboa Avenue to the north, Ruffin Road to the east, Aero Drive to the south, and Kearny Villa Road to the west. State Route (SR) 163 runs north-south to the west and I-15 runs north-south to the east. MYF is classified by the Federal Aviation Administration (FAA) as a general aviation airport, which is defined as a public-use airport that does not have scheduled service or has less than 2,500 annual passenger boardings. Activities at MYF encompass all aviation except air carrier services (defined as engaging in air transportation interstate, overseas or the transportation of mail). The types of general aviation aircraft that operate at MYF include private, corporate, charter, air ambulance, law enforcement, fire rescue, flight training, and cargo. Landside facilities at MYF include the terminal building (including administrative offices and the restaurant), hotel,

hangars (including the existing Miramar Hangar on the project site), parking lots, entrance roads, and support facilities, while airside facilities consist of three runways and 12 taxiways.

Outside of the MYF, the site is surrounded by established residential neighborhoods, commercial and light industrial development, and major transportation corridors. The visual character of the areas surrounding the project site is that of a highly developed landscape populated by industrial, institutional, and commercial land uses, with residential and park uses located farther to the north and south. Major transportation facilities, including I-805, SR 163, and I-15, provide expansive, hardscaped linear elements that further contribute to the developed nature of the areas surrounding the project site. Existing public views of the site are defined by a mix of airport-related uses and structures, including large hangars, SDFD uses adjacent to the west, a multi-story hotel adjacent to the airport property to the south, as well as surrounding commercial and residential uses beyond the nearby adjacent SR 163.

The freeways and major arterial corridors in Kearny Mesa contribute to the urban form of the community as they create an emphasis on the automobile. Signage, landscaping, and surface parking lots line the roadways and buildings are set back from the roadways but are generally arranged parallel to the roadway alignments.

Building forms in Kearny Mesa vary but are dominated by one- to two-story industrial buildings that range in size and style. Most industrial buildings ubiquitously exhibit a Modernist architectural style where the materials and construction methods convey the style. Common materials for existing industrial buildings within Kearny Mesa include glass, concrete masonry units, decorative block, cast concrete, steel, and aluminum.

Commercial buildings in Kearny Mesa consist of strip malls, freestanding retail buildings, and office parks. Commercial and retail buildings in Kearny Mesa feature stylistic influences from various sub-styles of Modernism. Building materials used on existing commercial and retail buildings in Kearny Mesa include glass, concrete masonry units, decorative block, cast concrete, and metal.

Residential buildings include one- to two-story single-family homes to multi-story, multi-family buildings in larger mid-rise style buildings. Areas of residential development are present in the project vicinity to the south of Aero Drive, beyond the commercial uses directly adjacent to Aero Drive, and in areas to the west, on the other side of I-805 and SR 163. Most of the existing residential development in Kearny Mesa has occurred within the last 25 years, resulting in building forms and design that are more contemporary and urban than existing commercial and industrial buildings.

3.1.1.3 Visual Resources

Topographically, the Kearny Mesa area lies on a relatively flat-top mesa and overall has little variation in landforms. However, canyon areas along I-15 and to the south of SR 52 provide open space and visual relief from the built environment. The Kearny Mesa Community Plan does not identify scenic vistas within the plan area; however, the Kearny Mesa Community Plan does identify public viewsheds in the plan area, including interior canyon views, panoramic views, and view overlooks along public roadways, pedestrian paths, and within canyons (City 2020a). Specifically, the Kearny Mesa Community Plan identifies public viewsheds to the southeast of MYF, including panoramic views adjacent to Daley Center Drive and interior canyon views and view overlooks adjacent to West Canyon Avenue. The project site is located within the southwestern portion of MYF and is not located within the portion of the airport

property where these viewsheds are located. The project site does not contain existing scenic resources such as trees or rock outcroppings. The Miramar Hangar is a historic building (refer to Section 3.4, *Cultural Resources*) and is present on the project site.

3.1.1.4 State Scenic Highways

SR 163 is located approximately 300 feet west of the project site. Additionally, I-805 is approximately 0.25 mile west of the project site. Neither of these roadways are designated or eligible state scenic highways (California Department of Transportation [Caltrans] 2026). There are no designated state scenic highways within the view shed of the project site and its immediate vicinity.

3.1.1.5 Light and Glare

The FAA has regulations pertaining to minimizing light and glare and the airport lighting scheme is required to be in conformance with FAA lighting standards. The MYF property contains existing lighting associated with airport operations, including safety and navigational lighting along the airside facilities as well as other exterior sources of light such as parking lot and vehicle lighting, security lighting, and landscape lighting. In addition to the light sources currently generated by MYF, several of the surrounding land uses support streetlights along roadways and parking lots, illuminated signs, landscape and security lighting, and light emitted from the interiors of the non-residential buildings.

The project site itself contains limited lighting associated with building light fixtures on the western and eastern ends of the Miramar Hangar. The east elevation of the structure contains a single light fixture centered above the hangar doors and the west elevation of the structure contains five, evenly spaced light fixtures. The remaining portions of the project site do not contain existing lighting sources. The Miramar Hangar is a painted steel structure. The paint on the surface of the structure minimizes glare from the structure.

3.1.2 Regulatory Framework

A summary of federal, state, District, and local regulations that pertain to aesthetics is provided below. No regional regulations regarding aesthetics apply to the project.

3.1.2.1 Federal

Federal Aviation Regulations Part 77

Federal Aviation Regulations Part 77 outlines the standards for identifying structures that could be obstructions to navigable airspace, sets forth requirements for notice to the FAA of certain proposed construction or alteration, and provides for aeronautical studies of obstructions to determine their effect on the safe and efficient use of airspace. Federal law requires sponsors of proposed structures or objects (including buildings, antennas, trees, and mobile and temporary objects, such as construction cranes) that exceed 14 Code of Federal Regulations (CFR) Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alteration (Form 7460-1) (refer to Sections 3.8, *Hazards and Hazardous Materials* and 3.10, *Land Use and Planning,* for specific criteria and the project's applicability).

To promote the visibility of aboveground structures, as well as to prevent glare impacts from objects in and near airports, the FAA has set standards for marking and lighting associated with the colors of

objects, dimensions and patterns of color bands and rectangles, colors and types of lights, basic signals and intensity of lighting, night/day lighting combinations, and flash rates. Notice received by the FAA under the Part 77 requirements is used, in part, to determine appropriate marking and lighting recommendations using FAA Advisory Circular 70/7460-1, *Obstruction Marking and Lighting*.

FAA Advisory Circular 70/7460-1

Any temporary or permanent structure, including all appurtenances, that exceeds any obstruction standard contained in 14 CFR Part 77 or an overall height of 200 feet (60.96m) above ground level should be marked and/or lighted. However, an FAA aeronautical study may reveal that the absence of marking and/or lighting will not impair aviation safety. Conversely, the object may present such an extraordinary hazard potential that higher standards may be recommended for increased conspicuity to ensure aviation safety. Recommendations for marking and/or lighting structures can vary, depending on terrain features, weather patterns, geographic location, number of structures, and overall design layout. The FAA may also recommend marking and/or lighting a structure that does not exceed 200 feet (60.96 m) above ground level or 14 CFR Part 77 standards because of its particular location.

The FAA will recommend only those marking and lighting systems that meet established technical standards and commercial outside lighting should not be used in lieu of FAA recommended marking and/or lighting. While additional lights may be desirable to identify an obstruction to air navigation, and may on occasion be recommended, the FAA will recommend minimum standards in the interest of safety, economy, and related concerns. Therefore, to provide an adequate level of safety, obstruction lighting systems should be installed, operated, and maintained in accordance with the recommended standards included in the advisory circular.

3.1.2.2 State

California Scenic Highway Program

Caltrans manages the California Scenic Highway Program, which was created in 1963 by the California Legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. The designation of a highway as scenic is based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the travelers' enjoyment of the view. State laws governing the Scenic Highway Program are found in Streets and Highways Code Sections 260 through 263.

3.1.2.3 District

District Design Guidelines and Standards Manual

The 2025 District Design Guide and Standards Manual (District 2025) was prepared for use by the design professionals and construction teams during the planning and design phases of renovation and construction projects for the District. It outlines the design approach, space allocation, physical environment, materials, and system requirements, and provides technical standards that the design and construction teams will be expected to meet or exceed. The general criteria and standards provided in this manual apply to all campuses within the District, and specific requirements related to each campus

are provided in individual campus guidelines and during the design process. Requirements related to aesthetics are outlined below.

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines Standard Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and SDCCD Sustainability Levels.

Sustainability Plan

Development of the District's Sustainability Plan included workshops in which feedback provided by students, faculty, and staff was used to identify key themes to guide the development of the goals for the Sustainability Plan. Each goal includes a Key Performance Indicator (KPI). These goals have been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects, and include the following related to aesthetics.

Health and Wellbeing Goal 1. Design spaces that reduce stress, maintain emotional well-being, and promote recovery (e.g., social services, biophilic design, wellness spaces). **KPI:** Access to views, fresh air, natural light/materials, plants, flexibility, places to grow things, meditate, reset, affirming.

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs.

The General Specifications section includes specifications for the design and construction of buildings and structures on District properties that relate to maintaining aesthetic value and minimizing glare. This includes specifications for window shade devices that must provide solar control, glare reduction, and energy efficiency while maintaining visibility and natural daylighting; designing classrooms to minimize glare on whiteboards; and utilizing glare-resistant projection screens.

This section also requires contractors for District projects to prepare mock-ups, which are physical assemblies of construction elements designed to establish quality standards for site work, interior finishes, and exterior finishes. They serve as full-scale representations to verify material selection, assess workmanship, and ensure compliance with design intent prior to full-scale installation. Mock-ups are required for the following construction elements:

1. Site Work: Concrete finishes, paving, hardscapes.
2. Interior Finishes: Paint, wall finishes, flooring.
3. Exterior Finishes: Masonry, stucco, cladding, glazing systems.

3.1.2.4 Local

Draft Airport Master Plan and Airport Layout Plan

The Draft Airport Master Plan (AMP; City 2025) defines the vision and provides the necessary framework to guide future airport development at MYF for a 20-year period. The Draft AMP is still undergoing environmental review and is still a draft document that has not yet been approved by the City. The Draft AMP provides a report of existing conditions, a forecast of aviation activity, facility requirements needed to accommodate the forecasted aviation activity, development and evaluation of alternatives to meet those needs, and an environmental overview and phased funding plan for the planned development. The Draft AMP additionally includes the ALP for MYF which is a scaled set of drawings of current and future airport facilities within a 20-year planning period. These drawings require approval by the FAA, which makes the airport eligible to receive federal funding for airport improvements and maintenance.

The AMP emphasizes minimizing visual impacts from future development through architecture, landscaping, lighting design, and site planning that are consistent with the Airport's surrounding urban context. It also identifies opportunities to improve the Airport's visual identity through modernization of the aging terminal and public facilities, creation of a public viewing area, enhanced visitor amenities, and landscaping where compatible with FAA safety requirements.

Airport Land Use Compatibility Plans

The San Diego Regional Airport Authority (SDCRAA) serves as the Airport Land Use Commission (ALUC) for San Diego County (County). The SDCRAA is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for 16 public use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general.

Montgomery Field Executive Airport ALUCP

The Montgomery Field ALUCP was adopted January 25, 2010 and amended December 20, 2010 (SDCRAA 2010). It establishes the AIA for the airport, which serves as the boundary for the ALUCP. The ALUCP is primarily focused on ensuring that development around MYF remains compatible with airport operations by addressing four key factors: noise, safety, airspace protection, and overflight impacts. As a result, visual considerations are generally framed in terms of preventing land uses, structures, lighting, glare, and other visual conditions that could interfere with aviation safety or create conflicts between the airport and surrounding communities. The plan does not establish a specific architectural style or aesthetic vision, but instead seeks to maintain an orderly and compatible built environment around the airport. According to the MYF ALUCP, any proposed object in an area of terrain penetration to airspace surfaces which has a height greater than 35 feet above ground level is subject to ALUC review.

City of San Diego General Plan

The City of San Diego General Plan (City 2024) includes a Citywide urban design strategy, goals, and policies regarding the physical features that define the character of a neighborhood or community. These goals complement the goals for pedestrian-oriented and walkable villages articulated in the City of Villages strategy upon which the General Plan is based.

Urban Design Element

The Urban Design Element of the General Plan establishes a set of design principles on which its policies are based and on which future public and private development physical design decisions can be based. Policies within this element generally direct future development to place growth into transit-oriented, mixed-use, and commercial areas; preserve and protect natural landforms and features; design streets to improve walkability, bicycling, and transit integration; and utilize sustainable building methods.

Conservation Element

The Conservation Element guides the sustainable management of the City's natural resources, with sections on open space and landform preservation, wetlands, and the urban forest. Policies call for the conservation of landforms, canyon lands, and open spaces that define the City's urban form, serve as core biological areas and wildlife linkages, or are wetland habitats. Policies related to wetlands require a watershed planning approach that preserves and enhances wetlands, and policies related to urban forestry call for the planting of large canopy shade trees where appropriate and with consideration of habitat and water conservation goals, as well as the retention of significant and mature trees.

City of San Diego Land Development Code

The City's Land Development Code is a portion of the San Diego Municipal Code that contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights, maximum lot coverage, minimum and maximum floor-area-ratios, and yard setbacks, the Land Development Code provides restrictions on land development and design that affect visual quality and provide for consistent visual character among specific land use designations.

The Land Development Code also contains development restrictions and guidelines to protect and enhance Environmentally Sensitive Lands. Steep hillsides are defined as those with natural gradients equal to or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet. San Diego Municipal Code Section 142.0101 et seq. contains grading regulations to address (among other things) landform preservation and requires that all grading be designed and performed in conformance with applicable City Council policies and the standards established in the Land Development Manual.

Kearny Mesa Community Plan

The Urban Design chapter of the 2020 Kearny Mesa Community Plan provides a framework for urban design and guidance for infill and placemaking design, including design of rights-of-way (ROWs), active streetscape and building interface, connectivity through superblocks, and wayfinding. The goals set forth in the Community Plan focus on creating active streets and inviting streetscapes. These goals are generally not applicable to the project.

3.1.3 Thresholds of Significance

Thresholds used to evaluate potential aesthetics impacts are based on CEQA Guidelines Appendix G. A significant aesthetics impact could occur if implementation of the proposed project would:

1. Have a substantial effect on a scenic vista;

2. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;

3. 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, conflict with an applicable zoning and other regulations governing scenic quality; or

4. Create a new source of substantial light and glare, which would adversely affect day and nighttime views in the area.

3.1.4 Impact Analysis

3.1.4.1 Scenic Vistas

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?

Impact Discussion

Project development would not occur in any location where public viewsheds or scenic resources are located. Additionally, the maximum allowable height within the project site is 50 feet. The project building would be two stories, with a maximum height of 32 feet, which is well within the 50-foot limit and is 3 feet, 6 inches taller than the current structure height. Thus, no new structures would be introduced that would obstruct any views into or across the airport property.

As the project site is not located within the vicinity of scenic vistas, and the project would not include development within or adjacent to a public viewshed, or introduce structures that would disrupt the existing views, the project would have a less than significant impact with regard to a substantial obstruction of a vista or scenic view from a public viewing area, including public viewsheds. Implementation of the project would not have a substantial adverse effect on a scenic vista. **Impacts would be less than significant**. No mitigation is required.

3.1.4.2 Scenic Resources

Threshold 2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Discussion

There are no designated state scenic highways within the view shed of the project area. As discussed in Section 3.1.1.3, the project site does not contain trees or rock outcroppings that would be considered scenic resources. While a historic building is present on the project site, this resource is not within or visible from a state scenic highway. As such, implementation of the project, including the removal of the historic structure would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **Impacts would be less than significant**. No mitigation is required.

3.1.4.3 Conflict with Scenic Quality Regulations

Threshold 3: In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact Discussion

The project site is located in a developed area that meets the criteria of an "urbanized area" as defined in Public Resources Code (PRC) Section 21071, which defines the term "urbanized area" for the purposes of CEQA to mean an incorporated city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. According to data from the U.S. Census Bureau, the population of the City in 2024 was 1,404,452 people (U.S. Census Bureau 2024). Thus, under CEQA, the project site would be considered within an urbanized area as defined by PRC Section 21071, with an applicable threshold for evaluation of visual character and quality impacts based on consistency with applicable zoning and other regulations governing scenic quality. As discussed further in Section 3.10*. Land Use and Planning*, the project would be subject to applicable regulations of the Airport Land Use Compatibility Plan (ALUCP), Airport Layout Plan (ALP), Airport Master Plan (AMP), Federal Aviation Regulations Part 77, and the District's Design Guidelines and Standards Manual. The City's General Plan classifies MYF as "unzoned" indicating that land uses are guided by the MYF ALUCP; thus, there is no applicable zoning for the project site contained in the San Diego Municipal Code.

The District relies on the comprehensive design standards and sustainability frameworks within the Design Guidelines and Standards Manual to guide development, which includes, but is not limited to, guidelines for building materials, color palettes, and specifications for lighting fixtures. The proposed building would consist of stucco walls and insulated metal panels featuring translucent panels and storefront glazing, and corrugated roofing. Gray stucco would match the color of the metal panels. The hangar door would be a bifold door to match the doors of the adjacent building.

While the project would not require mass grading or the substantial alteration of the existing landform, the project would result in a visual change at the project site by replacing the existing 6,300 SF Miramar Hangar with a larger, more modernized structure with a footprint of approximately 12,700 SF. The project would increase the size and bulk of the building by nearly doubling the building footprint above that used by the Miramar Hangar. The proposed 32-foot structure is 3 feet and 6 inches taller than the existing structure and is not expected to substantially degrade existing views in the area due to changes in height or bulk. While the proposed project would result in a visual change at the project site, the height and scale of the project would not be out of place in the existing built environment. The proposed project would comply with the aesthetic requirements for structures outlined in the Design Guidelines and Standards Manual and would be designed to complement the existing environs.

Additionally, the project would comply with the applicable requirements of Federal Aviation Regulations Part 77, which contains standards for identifying structures that could be obstructions to navigable airspace. Federal law requires sponsors of proposed structures or objects (including buildings, antennas, trees, and mobile and temporary objects, such as construction cranes) that exceed 14 CFR Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alteration (Form 7460-1). The project's compliance with Part 77 notification requirements, including the submittal of a Notice of

Proposed Construction or Alteration (Form 7460-1) would ensure review and approval of the proposed uses from the FAA. FAA review and approval would ensure that building height is appropriate for the proposed project.

Implementation of the project would not conflict with applicable zoning or other regulations governing scenic quality. **Impacts would be less than significant**. No mitigation is required.

3.1.4.4 Light and Glare

Threshold 4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact Discussion

The project site currently contains six lighting fixtures located on the Miramar Hangar, while the remainder of the site is unlit. The proposed project would introduce new lighting on the proposed structure and within the associated parking areas, including security lighting and interior illumination. Although these additions would increase the amount of onsite lighting, all fixtures would be comparable in type and function to existing airport lighting and would be designed in accordance with FAA requirements, including Federal Aviation Regulations Part 77 and review under the Notice of Proposed Construction or Alteration (Form 7460-1). In addition to regulating airside lighting, the FAA oversees the location, type, and height of all light sources within the airfield environment. Landside lighting associated with the project would be low-intensity, shielded, and directed downward. The proposed lighting would be consistent with existing industrial and commercial uses in the surrounding area and airport environs, and no sensitive residential receptors are located adjacent to the site.

Consistent with existing hangars at MYF, the proposed structure would not incorporate large expanses of reflective materials, such as glass, solar panels, or certain metals, that could typically result in glare and adversely affect aviation operations. As part of the FAA review process, the project applicant would be required to demonstrate through Form 7460-1 that the project would not create visual hazards, including glare. Implementation of the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **Impacts would be less than significant**. No mitigation is required.

3.1.5 Cumulative Impact Analysis

The geographic scope for aesthetics cumulative impact analysis includes the MYF property and the surrounding community, which includes the Kearny Mesa Community Plan area.

3.1.5.1 Scenic Vistas

The Kearny Mesa Community Plan area does not have prominent view corridors and does not contain any designated scenic vistas (City 2020b); thus, cumulative impacts associated with build out of the Kearny Mesa Community Plan would be less than significant. As discussed above, the project would not result in impacts to scenic vistas. Therefore, cumulative impacts related to scenic vistas would be **less than significant**.

3.1.5.2 Scenic Resources

The Kearny Mesa Community Plan area does not have iconic visual landmarks and no designated scenic highways occur within or adjacent to the Kearny Mesa Community Plan area (City 2020b). As such, no cumulative impacts associated with scenic resources within a state scenic highway are identified for the Kearny Mesa Community Plan area. Cumulative impacts to scenic resources **would be less than significant.**

3.1.5.3 Conflict with Scenic Quality Regulations

The scenic quality of the surrounding community is regulated by the City of San Diego General Plan and the Kearny Mesa Community Plan. The Kearny Mesa Community Plan build out would result in significant and unavoidable aesthetic impacts to the existing neighborhood character associated with an aggregate shift in character from a predominately lower density, commercial and industrial employment center to also include higher density, mixed-use urban village and employment hub. As the project would result in the replacement of the Miramar Hangar with the Miramar College AIC building, which would continue to use the project site for instructional purposes on the existing airport property, and the project would be required to adhere to District design standards and sustainability frameworks within the Design Guidelines and Standards Manual to guide development, the project would not cumulatively contribute to the significant and unavoidable aesthetic impacts associated with build out of the Kearny Mesa Community Plan. Project impacts to significant and unavoidable neighborhood character and scenic quality regulation impacts **would not be cumulatively considerable**.

3.1.5.4 Light and Glare

Cumulative impacts related to light and glare could occur if future projects proposed in an area would add individual light sources or reflective surfaces that together combine to adversely affect daytime or nighttime views. Typical cumulative development projects within the City would be required to comply with San Diego Municipal Code policies, and projects within the airport property would be required to adhere to FAA requirements and standards, as applicable, related to the reduction of light and glare, especially related to light shielding for neighboring properties. As such, through regulatory and policy compliance, development proposed in the Kearny Mesa Community Plan area would not create substantial light or glare. As discussed in Section 3.1.4.4 above, the proposed project would result in less than significant impacts related to light and glare. Therefore, cumulative impacts related to light and glare would be **less than significant**.

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3.2 Air Quality

This section addresses the potential air quality impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to air quality are also addressed. This section relies on the information and analysis in the Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2026), provided as Appendix B to the EIR.

3.2.1 Environmental Setting

The project site is located within the San Diego Air Basin (SDAB), which comprises all of the County of San Diego (County). Air quality in the SDAB is regulated by the U.S. Environmental Protection Agency (USEPA) at the federal level, by the California Air Resources Board (CARB) at the state level, and by the San Diego County Air Pollution Control District (SDAPCD) at the regional level.

3.2.1.1 Air Pollutants of Concern

Criteria Pollutants

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the public. In general, criteria air pollutants include the following compounds:

- Ozone
- Carbon monoxide (CO)
- Nitrogen dioxide (NO_2)
- Particulate matter (PM), which is further subdivided:
  - Coarse PM, 10 microns or less in diameter (PM_{10})
  - Fine PM, 2.5 microns or less in diameter ($PM_{2.5}$)
- Sulfur dioxide (SO_2)
- Lead

Criteria pollutants can be emitted directly from sources (primary pollutants; e.g., CO, SO_2, PM_{10}, $PM_{2.5}$, and lead), or they may be formed through chemical and photochemical reactions of precursor pollutants in the atmosphere (secondary pollutants; e.g., ozone, NO_2, PM_{10}, and $PM_{2.5}$). PM_{10} and $PM_{2.5}$ can be both primary and secondary pollutants. The principal precursor pollutants of concern are reactive organic gases ([ROGs] also known as volatile organic compounds [VOCs])[1] and nitrogen oxides (NO_X), which react to form ozone.

Descriptions of sources and general health effects for each of the criteria air pollutants are shown in Table 3.2-1, *Common Sources and Human Health Effects of Criteria Air Pollutants*. Specific adverse health effects on individuals or population groups induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables such as cumulative concentrations, local meteorology and atmospheric conditions, and the number and characteristics of exposed individuals (e.g., age, gender). Criteria pollutant precursors (ROG and NO_X) affect air quality on a regional scale,

[1] CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

typically after a significant delay and distance from the pollutant source emissions. Health effects related to ozone and NO_2 are, therefore, the product of emissions generated by numerous sources throughout a region.

Emissions of criteria pollutants from vehicles traveling to or from the project site (mobile emissions) are distributed nonuniformly in location and time throughout the region, wherever the vehicles may travel. As such, specific health effects from these criteria pollutant emissions cannot be meaningfully correlated to the incremental contribution from the project at a regional scale.

Table 3.2-1
COMMON SOURCES AND HUMAN HEALTH EFFECTS OF CRITERIA AIR POLLUTANTS

Pollutant	Major Human-Made Sources	Human Health Effects
Carbon Monoxide (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, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to climate change and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrogen oxides (NO_X) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, 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. Damages rubber, some textiles, and dyes.
Particulate Matter (PM_{10} and $PM_{2.5}$)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and other sources.	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).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned, when gasoline is extracted from oil, or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: CARB 2026a; USEPA 2026

Toxic Air Contaminants

California Health and Safety Code Section 39655(a) defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (CAA) (42 U.S. Code Section 7412[b]) is a TAC. Under state law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is less than 2.5 microns in diameter (CARB 2026b). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California's population; it is estimated that about 70 percent of total known cancer risk related to air toxins in California is attributable to DPM (CARB 2026b).

3.2.1.2 Climate and Meteorology

The climate in southern California, including the SDAB, is controlled largely by the large-scale meteorological condition that dominates the west coast of the U.S.: a seasonally semi-permanent high-pressure cell centered over the northeastern Pacific Ocean, called the Pacific high, which keeps most storms from affecting the California coast. Areas within 30 miles of the coast in the San Diego region, including the project site, experience moderate temperatures and comfortable humidity.

Due to its climate, the SDAB experiences frequent temperature inversions (temperature increases as altitude increases, which is the opposite of general patterns). Temperature inversions prevent air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere, creating a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving the air pollutants inland, toward the foothills. During the fall and winter, air quality problems are created due to CO and NO_2 emissions. High NO_2 levels usually occur during autumn or winter, on days with summer-like conditions.

The predominant wind direction in the vicinity of the project site is from the west and the average wind speed is approximately 5.6 miles per hour (mph; Iowa Environmental Mesonet 2026). The annual average maximum temperature in the project area is approximately 72.4 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56.2°F. Total precipitation in the project area averages 11 inches annually (Iowa Environmental Mesonet 2026).

3.2.1.3 Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65 years of age,

children under 14 years of age, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The project site is surrounded by aviation-related, commercial, and institutional uses. The nearest sensitive land use is a multi-family residential development called AMLI Aero located at the southeast corner of Aero Drive and Aero Court, approximately 1,300 feet south of the project site.

3.2.1.4 Existing Regional Air Quality

Attainment Designations

Attainment designations are discussed further in Section 3.2.2.2 below. In short, regions are designated as being in attainment or nonattainment for each criteria air pollutant based on whether they achieve the relevant federal or state air quality standards. The SDAB is classified as a nonattainment area under the National Ambient Air Quality Standards (NAAQS) for ozone (8-hour) and as a nonattainment area under the California Ambient Air Quality Standards (CAAQS) for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$. The SDAB is an attainment area for all other criteria pollutants.

Monitored Air Quality

The SDAPCD operates a network of ambient air monitoring stations throughout the San Diego region. The purpose of monitoring stations is to measure ambient concentrations of criteria air pollutants and determine whether the ambient air quality meets state and federal standards. The nearest ambient monitoring station to the project site is the San Diego Kearny Villa Road monitoring station located approximately 2.5 miles north of the project site. Data at this monitoring site are collected for ozone, $PM_{2.5}$, and NO_2. Air quality monitoring data for CO and PM_{10} were obtained from the SDAPCD Annual Air Quality Monitoring Network Plan (SDAPCD 2025) and represent countywide concentrations. Air quality data for the years 2022 through 2024 are shown in Table 3.2-2, *Air Quality Monitoring Data*.

Table 3.2-2
AIR QUALITY MONITORING DATA

Pollutant Standard	2022	2023	2024
Ozone (O_3) – Kearny Villa Road			
Maximum concentration 1-hour period (ppm)	0.095	0.091	0.112
Maximum concentration 8-hour period (ppm)	0.083	0.080	0.081
Days above 1-hour state standard (>0.09 ppm)	1	0	2
Days above 8-hour state/federal standard (>0.070 ppm)	2	3	3
Carbon Monoxide (CO) – Countywide			
Maximum 8-hour concentration (ppm)	1.2	2.1	2.8
Days above federal standard (>9.0 ppm)	0	0	0
Respirable Particulate Matter (PM10) – Countywide			
Maximum 24-hour concentration (µg/m3)	243	175	152
Days above federal standard (>150 µg/m3)	3	1	01
Fine Particulate Matter (PM2.5) – Kearny Villa Road			
Maximum 24-hour concentration (µg/m3)	13.9	24.5	21.1
Measured Days above 24-hour federal standard (>35 µg/m3)	0	0	0

Pollutant Standard	2022	2023	2024
Fine Particulate Matter (PM2.5) – Kearny Villa Road			
Annual average (µg/m3)	6.8	7.0	8.0
Exceed federal annual standard (>9.0 µg/m3)	No	No	No
Exceed state annual standard (>12 µg/m3)	No	No	No
Nitrogen Dioxide (NO2) – Kearny Villa Road			
Maximum 1-hour concentration (ppm)	0.051	0.038	0.042
Days above state 1-hour standard (>0.18 ppm)	0	0	0
Days above federal 1-hour standard (>0.100 ppm)	0	0	0
Annual average (ppm)	0.008	0.006	0.005
Exceed annual federal standard (>0.053 ppm)	No	No	No
Exceed annual state standard (>0.030 ppm)	No	No	No

Source: CARB 2026c; SDAPCD 2025

[1] While the reported maximum 24-hour concentration exceeds 150 µg/m^3, SDACPD reports no daily exceedance for 2024.

ppm = parts per million; µg/m3 = micrograms per cubic meter

As shown in Table 3.2-2, monitoring data at the Kearny Villa Road station reported exceedances of the 1-hour state ozone standard in 2022 and 2024 and exceedances of the 8-hour state and federal ozone standard each of the three years sampled. The Kearny Villa Road station reported no exceedances of the federal and state standards for $PM_{2.5}$ or NO_2 between 2022 and 2024 (CARB 2026c). Countywide data shows exceedances of the 24-hour PM_{10} standard in 2022 and 2023 and no exceedances of the CO standards for the sample period (SDAPCD 2025).

3.2.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to air quality is provided below.

3.2.2.1 Federal

Federal Clean Air Act

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. The USEPA is responsible for enforcing the federal CAA of 1970 and its 1977 and 1990 Amendments. The federal CAA required the USEPA to establish NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for the criteria pollutants discussed above. Primary standards are designed to protect human health with an adequate margin of safety. Secondary standards are designed to protect property and the public welfare from air pollutants in the atmosphere. Table 3.2-3, *Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for these pollutants.

Table 3.2-3
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1]	Federal Standards Secondary[2]
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM_{10}	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
$PM_{2.5}$	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	9.0 µg/m^3 [3]	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
NO_2	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
SO_2	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	–	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	Same as Primary
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	No Federal Standards
Sulfates	24 Hour	25 µg/m^3	No Federal Standards	No Federal Standards
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	No Federal Standards	No Federal Standards
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)	No Federal Standards	No Federal Standards

Source: CARB 2024; USEPA 2025

[1] National Primary Standards: The levels of air quality necessary, within an adequate margin of safety, to protect public health.

[2] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[3] On February 7, 2024, the USEPA announced a final rule to lower the annual arithmetic mean (AAM) primary NAAQS for $PM_{2.5}$ from 12 µg/m^3 to 9 µg/m^3. The CAAQS has not been lowered; therefore, the more stringent NAAQS applies.

O_3 = ozone; ppm = parts per million; µg/m^3 = micrograms per cubic meter; PM_{10} = particulate matter with a diameter of 10 microns or less; AAM = Annual Arithmetic Mean; $PM_{2.5}$ = fine particulate matter; CO = carbon monoxide; mg/m^3 = milligrams per cubic meter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; km = kilometer; – = No Standard

The USEPA has classified air basins (or portions thereof) as being in "attainment," "nonattainment," "maintenance," or "unclassified" for each criteria air pollutant, based on whether the NAAQS have been achieved. Upon attainment of a standard for which an area was previously designated nonattainment, the area is classified as a maintenance area. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation. The

project site is located within the SDAB and, as such, is in an area designated as a nonattainment area for certain pollutants that are regulated under the federal CAA. Table 3.2-4, *San Diego Air Basin Attainment Status*, lists the federal and state attainment status of the SDAB for the criteria pollutants. Effective July 2, 2021, the SDAB was classified as a Severe-15 nonattainment area for the 8-hour NAAQS for ozone (USEPA 2025). The SDAB is an attainment area or unclassifiable for the NAAQS for all other criteria pollutants (SDAPCD 2026).

Table 3.2-4
SAN DIEGO AIR BASIN ATTAINMENT STATUS

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-hour)	Attainment[1]	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
CO	Attainment	Attainment
PM_{10}	Unclassifiable[2]	Nonattainment
$PM_{2.5}$	Attainment	Nonattainment[3]
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassified
Visibility	(No federal standard)	Unclassified

Source: SDAPCD 2026; USEPA 2025

[1] The federal 1-hour standard of 12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[2] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

[3] CARB has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal $PM_{2.5}$ standards, the data completeness requirements for state $PM_{2.5}$ standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. SDAPCD has begun replacing most regional filter-based $PM_{2.5}$ monitors as they reach the end of their useful life with continuous $PM_{2.5}$ air monitors to ensure collected data meets stringent completeness requirements in the future. SDAPCD anticipates these new monitors will be approved as "CAS" monitors once CARB reviews the list of approved monitors, which has not been updated since 2013.

CO = carbon monoxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide

3.2.2.2 State

California Clean Air Act

The federal CAA allows states to adopt ambient air quality standards and other regulations provided they are at least as stringent as federal standards. CARB has established the more stringent CAAQS for the six criteria pollutants through the California CAA of 1988 and has established CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles (refer to Table 3.2-1). Similar to the NAAQS, areas that do not meet the CAAQS for a particular pollutant are designated "nonattainment" areas for that pollutant. As shown in Table 3.2-4, the SDAB is currently classified as a nonattainment area under the CAAQS for ozone (8-hour and 1-hour), PM_{10}, and $PM_{2.5}$. The SDAB is an attainment area for the CAAQS for all other criteria pollutants (SDAPCD 2026).

State Implementation Plan

The federal CAA requires areas with unhealthy levels of criteria pollutants to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how an area will attain the NAAQS. The 1990 amendments to the federal CAA set deadlines for attainment based on the severity of an area's air pollution problem. SIPs are not single documents—they are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations, and federal controls. Many of California's SIPs rely on a core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards the SIP revisions to the USEPA for approval and publication in the Federal Register. The Code of Federal Regulations (CFR) Title 40, Chapter I, Part 52, Subpart F, Section 52.220 lists all of the items that are included in the California SIP (CARB 2026d). At any one time, several California submittals are pending USEPA approval.

Mobile sources are regulated by the USEPA and CARB, and the emissions reduction strategies related to mobile sources are considered in the local air quality plans. Public Laws 119-15, 119-16, and 119-17 were enacted by U.S. Congress in May 2025 and were signed into law in June 2025, which nullified various USEPA rules regarding California advanced clean car and truck emissions standards. Specifically, these Public Laws disapproved preemption waivers previously approved by the USEPA for the Advanced Clean Cars, California's Advanced Clean Trucks, Zero-Emission Airport Shuttle, and Omnibus Low NO_x regulations. Accordingly, these regulations are preempted by the federal CAA, meaning that California can no longer enforce or attempt to enforce the regulations and that estimated emissions reductions attributed to the regulations cannot be used for development of the California SIP or conformity determinations.

3.2.2.3 Regional

Attainment Plan and Regional Air Quality Strategy

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The current regional air quality plan for attainment of the NAAQS in the County is SDAPCD's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan; SDAPCD 2020). The Attainment Plan, which would be a revision to the SIP, outlines SDAPCD's plans and control measures designed to attain the NAAQS for ozone. The current regional air quality plan for attainment of the CAAQS is SDAPCD's *2022 Revision to the Regional Air Quality Strategy for San Diego County* (RAQS; SDAPCD 2023). The RAQS was initially adopted in 1992 and identifies measures to reduce emissions from sources regulated by the SDAPCD, primarily stationary sources such as industrial operations and manufacturing facilities. The RAQS is periodically updated to reflect updated information on air quality, emission trends, and new feasible control measures (SDAPCD 2023). These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the NAAQS and CAAQS.

The Attainment Plan and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through

regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County.

San Diego County Air Pollution Control District Rules and Regulations

SDAPCD adopts rules to regulate pollutant emissions from various sources in the County. The rules also establish procedures for SDAPCD permitting, fees, and hearings. The SDAPCD rules most relevant to the project are described below.

Rule 50 (Visible Emissions)

Particulate matter pollution impacts the environment by decreasing visibility (haze). These particles vary greatly in shape, size, and chemical composition, and come from a variety of natural and manmade sources. Some haze-causing particles are directly emitted to the air such as windblown dust and soot. Others are formed in the air from the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of $PM_{2.5}$. These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment.

Visibility reduction is probably the most apparent symptom of air pollution. Visibility degradation is caused by the absorption and scattering of light by particles and gases in the atmosphere before it reaches the observer. As the number of fine particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range. Light absorption by gases and particles is sometimes the cause of discolorations in the atmosphere but usually does not contribute very significantly to visibility degradation. Scattering by particulates impairs visibility much more readily. SDAPCD Rule 50 (Visible Emissions) sets emission limits based on the apparent density or opacity of the emissions using the Ringelmann scale (SDAPCD 1997).

Rule 51 (Nuisance)

SDAPCD Rule 51 (Nuisance) states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which 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 or have a natural tendency to cause injury or damage to business or property. The provisions of the rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals (SDAPCD 1976).

Rule 55 (Fugitive Dust Control)

SDAPCD Rule 55 (Fugitive Dust Control) requires action be taken to limit dust from construction and demolition activities from leaving the property line. Similar to Rule 50 (Visible Emissions), Rule 55 (Fugitive Dust Control) places limits on the amount of visible dust emissions in the atmosphere beyond the property line. It further stipulates that visible dust on roadways as a result of track-out/carry-out shall be minimized through implementation of control measures and removed at the conclusion of each workday using street sweepers (SDAPCD 2009).

Rule 67.0.1 (Architectural Coatings)

Effective January 1, 2022, SDAPCD Rule 67.0.1 (Architectural Coatings) establishes standards for the VOC content of architectural coatings by coating category. It requires general flat and non-flat coatings (e.g.,

paint) to have 50 grams per liter (g/L) or less VOC content and traffic marking coatings to have 100 g/L or less VOC content (SDAPCD 2021).

3.2.2.4 District

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and Sustainability Levels. Development of the District's Sustainability Plan included workshops in which feedback provided by students, faculty, and staff was used to identify key themes to guide the development of the goals for the Sustainability Plan. These goals have been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects and include the following related to air quality.

Materials Impact Goal 2. Provide healthy environment that does not abuse material resources and improves health. **KPI:** Maintain optimal CO_2 and VOC levels. Use materials that are low-carbon, recycled, or responsibly sourced.

Design Guides and Standards

Section 2.1 of the District Design Guidelines and Standards Manual outlines general procedures and standards for new construction and building modifications on District campuses. This section specifies that interior finishes on all renovations or new construction on District properties much use composite wood products which meet CARB Phase 2 requirements, and that all adhesives, sealants, paints, and coatings must meet or exceed South Coast Air Quality Management District (SCAQMD) Rule 1113 VOC content limits. The SCAQMD Rule 1113 limits for building envelope coating (50 g/L) and traffic coatings (100 g/L) are equivalent to the SDAPCD Rule 67.0.1 requirements for general flat and non-flat coatings and traffic marking coatings outlined in Section 3.2.2.3 above).

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. Related to air quality, the District standard is for all new equipment to be all-electric and not use natural gas for functions that can instead be served by electric equipment, such as building and water heating. Natural gas may be used in select instances where electric alternatives are not available or would not serve the intended purpose, subject to prior approval by District Architect.

3.2.2.5 Local

San Diego Municipal Code

The San Diego Municipal Code addresses the release of air contaminants in Section 142.0710, *Air Contaminant Regulations*, which states:

> Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling, shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

3.2.3 Thresholds of Significance

Thresholds used to evaluate potential air quality impacts are based on CEQA Guidelines Appendix G. A significant air quality impact could occur if implementation of the proposed project would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. 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;
3. Expose sensitive receptors to substantial pollutant concentrations; or
4. Result in emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the CEQA Guidelines states that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the above determinations. Therefore, to determine whether a project would result in a cumulatively considerable net increase of PM_{10}, $PM_{2.5}$, or ozone precursors (NO_X and VOCs), project emissions can be evaluated in comparison with the quantitative emission thresholds established by the SDAPCD. As part of its air quality permitting process, the SDAPCD has established thresholds in Rules 20.2 and 20.3 for the preparation of Air Quality Impact Assessments. In the absence of SDAPCD adopted thresholds for VOCs, the City's screening threshold is used in this analysis (City 2022).

The screening criteria were developed by SDAPCD with the purpose of attaining the NAAQS and CAAQS. Therefore, for CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to regional air quality. The screening thresholds are included in Table 3.2-5, *Screening-Level Thresholds for Air Quality Impact Analysis*.

Table 3.2-5
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

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

Source: SDAPCD 2019; City 2022

3.2.4 Impact Analysis

3.2.4.1 Air Quality Plans

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact Discussion

The Attainment Plan and RAQS are the applicable air quality plans for the project region. These plans rely on information from CARB and SANDAG, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of their respective general plans. As such, projects that propose development consistent with the growth anticipated by the local jurisdictions' general plans and which do not result in criteria pollutant and precursor emissions in excess of the applicable emissions thresholds would be considered consistent with the Attainment Plan and RAQS.

The project proposes the redevelopment and expansion of an instruction facility for use by the Aviation Operations Program offered by Miramar College. The project would continue the existing use of the project site and would be consistent with the adjacent airport uses and surrounding uses. The project site is mapped as an Institutional land use in the Kearny Mesa Community Plan and would continue this land use with project implementation. Furthermore, as discussed in Section 3.2.4.2, below, the project's construction and operation activities would not result in pollutant emissions in excess of applicable thresholds. Because emissions would be below the applicable thresholds, and because the project would be consistent with the land use designation for the project site, the project would not conflict with or obstruct implementation of the Attainment Plan or RAQS for the SDAB. **Impacts would be less than significant**. No mitigation is required.

3.2.4.2 Air Quality Standards

Threshold 2: Would the project 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?

Impact Discussion

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SDAB. The region is a federal and/or state nonattainment area for ozone, PM_{10}, and $PM_{2.5}$. Implementation of the project would generate criteria pollutants and ozone precursors during construction activities and on an ongoing basis during operation. To determine whether the project would result in a cumulatively considerable net increase in criteria pollutants that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, project construction and operational emissions are evaluated in comparison with the quantitative screening thresholds discussed in Section 3.2.3 and shown in Table 3.2-5.

Criteria pollutant and precursor emissions were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with California air quality management and pollution control districts (CAPCOA 2022). In brief, CalEEMod is a computer model that estimates criteria air pollutant and greenhouse gas (GHG) emissions from mobile (i.e., vehicular) sources, area sources (fireplaces, woodstoves, and landscape maintenance equipment), energy use (electricity and natural gas used in space heating, ventilation, and cooling; lighting; and plug-in appliances), water use and wastewater generation, solid waste disposal, and stationary sources. In various places, the user can input additional information and/or override the default assumptions to account for project- or location-specific parameters. For the assessment of air quality impacts, the inputs focus on mobile, area, energy (natural gas), and stationary sources. Default parameters were not changed unless otherwise noted below. See Appendix B to the EIR for additional details regarding model inputs.

As discussed in Section 3.2.2.2, Public Laws 119-15, 119-16, and 119-17 were signed into law in June 2025, nullifying various USEPA rules regarding California advanced clean car and truck emissions standards. These laws may ultimately lead to increased mobile emissions depending on how they are implemented by the state. However, near term mobile emissions are expected to remain mostly accurate at buildout, which is relatively near term. As of the date of this report, CARB has not implemented revisions to EMFAC in response to these Public Laws. Because CalEEMod relies on EMFAC emission factors, estimated mobile source emissions would not be materially different from those presented in this report.

Construction Emissions

Construction emissions were estimated using CalEEMod. Construction input data for CalEEMod include, but are not limited to, (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the project area. Construction emissions were estimated based on the construction schedule provided by the District Architect, which assumes construction would be completed in one phase commencing in September 2027 and completing in September 2028. The

quantity, duration, and intensity of construction activity influence the amount of construction emissions and related pollutant concentrations that occur at any one time. As such, the emission forecasts provided herein reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of construction activity is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted. If construction is delayed or occurs over a longer period, emissions could be reduced because of: (1) a more modern and cleaner-burning construction equipment fleet mix than assumed in CalEEMod; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Construction activities would include site preparation (clearing and grubbing), demolition, grading, trenching for underground utilities, building construction, paving, and architectural coatings. Construction is assumed to occur five days per week with equipment operating up to eight hours per day. Site preparation would include the removal of vegetation and debris, estimated at approximately 10 truckloads. During demolition, approximately 25 truckloads of debris would be removed from the project site. Grading would be balanced onsite resulting in no haul truck trips. Emissions estimated for construction assume conformance with SDAPCD Rules 55 and 67.0.1, specifically watering exposed areas twice per day, limiting vehicle speeds on unpaved on-site roads, and limiting the VOC content of architectural coatings to 50 g/L for building coatings and 100 g/L for parking lot markings.

The results of the emissions calculations for construction of each of the near-term projects are shown in Table 3.2-6, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions in comparison with the daily thresholds provided in Table 3.2-5. The complete CalEEMod output is provided in Appendix A of Appendix B to this EIR.

Table 3.2-6
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Calendar Year	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2027	1.1	7.3	11.5	<0.1	0.7	0.4
2028	2.0	11.0	17.0	<0.1	0.5	0.4
Maximum Daily Emissions	**2.0**	**11.0**	**17.0**	<0.1	**0.7**	**0.4**
Screening Threshold	*137*	*250*	*550*	*250*	*100*	*67*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026 (Appendix B)
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides;
PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3.2-6, the project's short-term construction-related criteria pollutant and precursor emissions would be below the screening thresholds. Therefore, construction of the project would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment.

Operational Emissions

Operational emissions associated with buildout of the project were estimated using CalEEMod as discussed above. Model inputs for mobile sources were based on the Local Mobility Analysis prepared for the project, which concluded that the project would result in 222 average daily trips (ADT; Linscott, Law & Greenspan Engineers [LLG] 2026). In accordance with District policies, the project would be all-electric (would not use natural gas), and the natural gas use was set to zero.

As discussed in Section 2.4.1, the project would allow for an additional three class sessions per day resulting in the engine testing activity, which occurs on the eastern portion of the project site once a week under existing conditions, to occur twice a week in the same location. This additional weekly test was modeled assuming a general aviation piston engine as classified by USEPA. Emission factors from USEPA's *Generic Aircraft Type Emission Factors* were used assuming one test cycle would be similar to one landing and take-off cycle (USEPA 2014). Operational emissions calculations and model outputs are provided in Appendix A of Appendix B. Table 3.2-7, *Daily Operational Emissions*, presents the summary of the increase in daily operational emissions for the project in comparison with the daily thresholds provided in Table 3.2-5.

Table 3.2-7
DAILY OPERATIONAL EMISSIONS

Category	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile	0.8	0.6	5.7	<0.1	1.4	0.4
Area	0.5	<0.1	0.8	<0.1	<0.1	<0.1
Aircraft Engine Testing	0.2	0.1	12.0	<0.1	0.2	0.2
Total Daily Emissions[1]	**1.5**	**0.6**	**18.5**	**<0.1**	**1.6**	**0.5**
Screening Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026 (Appendix B)

[1] Totals and differences may not compute due to rounding.

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3.2-7, the increase in emissions of all criteria pollutants and ozone precursors associated with operation of the project would be below the daily thresholds. Therefore, operation of the project would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment.

Implementation of the project 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. **Impacts would be less than significant**. No mitigation is required.

3.2.4.3 Sensitive Receptors

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact Discussion

Construction Activities

Implementation of the project would result in the use of heavy-duty construction equipment, haul trucks, and construction worker vehicles. These vehicles and equipment could generate the TAC DPM. CARB has declared that DPM from diesel engine exhaust is a TAC, and OEHHA has determined that chronic exposure to DPM can cause carcinogenic and non-carcinogenic health effects. For this reason, although other pollutants would be generated from project construction, DPM is the primary pollutant of concern.

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has to the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer HRAs are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long-duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). In addition, concentrations of mobile-source DPM emissions disperse rapidly and are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the construction activity, the construction-related emissions to which nearby receptors are exposed would also vary throughout the construction period. During some equipment-intensive activities, such as demolition or grading, construction-related emissions would be higher than during other, less equipment-intensive activities, such as building construction. Considering the short duration when intensive off-road diesel equipment would be used on site and the highly dispersive nature of DPM, construction would not expose sensitive receptors to substantial DPM concentrations.

Operational Activities

Potential impacts to sensitive receptors during project operation are analyzed for CO hotspots and exposure to TACs.

CO Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found within close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (i.e., congested intersection) increases. The increased trips associated with the project has the potential of contributing to localized “hot spots” of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections.

The SDAPCD does not have screening criteria for when an intersection or road segment might generate CO hotspots. However, the volume of vehicles required to result in a CO hotspot is very high. For example, the Bay Area Air District’s screening criteria for CO hotspots is intersections with more than 44,000 vehicles per hour, or intersections with 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway; Bay Area Air District 2023).

The project’s Local Mobility Analysis includes an analysis of traffic volumes for project-affected intersections. The highest volume analyzed intersection would be the intersection of Kearny Villa Road and Aero Drive which is forecast to carry 4,199 vehicles during the afternoon peak hour in the Opening Year plus project scenario (LLG 2026). This traffic volume is substantially below the 44,000 vehicles per hour screening level for CO hotpots suggested by the Bay Area Air District. Therefore, long-term

operation of the project would not expose sensitive receptors to substantial localized concentrations of CO.

Operational TAC Emissions

CARB siting recommendations within the *Air Quality and Land Use Handbook* suggest a detailed health risk assessment should be conducted for sensitive receptors within 1,000 feet of a warehouse distribution center, within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet of a typical gas dispensing facilities, within 300 feet of a dry cleaning facility that uses perchloroethylene, or 500 feet of a freeway or urban road with 100,000 or more vehicles per day (CARB 2005).

The project would include academic and parking uses and would not represent a substantial source of TACs. Furthermore, as noted in Section 3.2.1.3, the nearest existing sensitive receptor is located farther than CARB's 1,000-foot recommended siting distance from the project site. As such, the project would not expose sensitive receptors to substantial pollutant concentrations. **Impacts would be less than significant**. No mitigation is required.

3.2.4.4 Odors

Threshold 4: Would the project result in emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Discussion

As discussed above in Section 3.1, SDAPCD Rule 51 prohibits emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Any unreasonable odor discernible at the property line of the project site is considered a significant odor impact.

Implementation of the project could produce temporary odors during proposed construction activities from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, odors emitted during construction would be temporary, short-term, and intermittent in nature, as they would cease upon the completion of construction. Accordingly, the project would not create objectionable odors affecting a substantial number of people during construction.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The project, involving academic and parking uses, would not include these uses. Furthermore, the project would not result in any changes to the types of activities already occurring on the project site. The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **Impacts would be less than significant**. No mitigation is required.

3.2.5 Cumulative Impact Analysis

The geographic scope for the air quality plans and air quality standards cumulative analysis is the SDAB. It is appropriate to consider the entire air basin for these thresholds as pollutant emissions can travel

substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. Potential impacts to sensitive receptors and odor generation are more localized, and a cumulative impact for these thresholds could occur if concurrent construction or operations would generate substantial pollutants or odorous emissions that would combine to affect neighboring land uses in the immediate vicinity.

3.2.5.1 Air Quality Plans

A metric for assessing a project's cumulative impact with respect to air quality is whether it is consistent with the assumptions underlying an adopted local, regional, or statewide plan, or a related planning document on air quality. Cumulative development projects proposed within the SDAB could propose general plan amendments or land use or zoning changes that result in development that is not accounted for in the growth assumptions that inform the SDAB air quality plans, resulting in a significant cumulative impact. However, as discussed above, the project would not generate emissions that are unaccounted for in regional planning documents. As such, the contribution of the project to the significant cumulative impact **would not be cumulatively considerable**.

3.2.5.2 Air Quality Standards

The SDAB is classified as a nonattainment area under the NAAQS for ozone (8-hour) and as a nonattainment area under the CAAQS for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5.}$ The nonattainment status of regional pollutants is a result of past and present development within the SDAB, and this regional impact is cumulative in nature rather than attributable to any one source. Cumulative projects throughout the air basin could generate construction and operational emissions of PM and the ozone precursors VOC and NO_X that contribute to significant cumulative air quality impacts. The thresholds of significance established by the SDAPCD (refer to Table 3.2-5) are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions of the SDAB. These thresholds are designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards. As described in Section 3.2.4.2 above, emissions during construction and operation of the project would not generate emissions that would violate these thresholds or contribute substantially to an existing or projected air quality violation. As such, the contribution of the project to the air quality status of the SDAB **would not be cumulatively considerable**.

3.2.5.3 Sensitive Receptors

Cumulative development projects could result in significant impacts to sensitive receptors during construction and operation. Although construction of these cumulative development projects would likely be short term and involve construction activities at various locations throughout the project vicinity, it is unknown at this time the scale and nature of these construction activities. In addition, cumulative development projects could result in an increase in trips which contribute to a CO hotspot and could locate sensitive receptors within the CARB siting recommendations within the *Air Quality and Land Use Handbook*. Although cumulative discretionary development projects involving this type of development would likely be required to conduct a Health Risk Assessment and incorporate mitigation measures to reduce these potential impacts to sensitive receptors, cumulative impacts are considered significant. However, as discussed above, the project would not expose sensitive receptors to substantial

pollutant concentrations during either construction or operations. Therefore, the project would **not result in a cumulatively considerable contribution** to impacts to sensitive receptors.

3.2.5.4 Odors

Cumulative development projects that are proposed on neighboring properties to the project site could produce odors similar to the project during construction and operation. Construction odors would be temporary and short term, and even if multiple construction projects occur in close proximity to each other, the respective odorous emissions would cease at the conclusion of construction. Once operational, cumulative development projects adjacent to the project site are not anticipated to propose land uses associated with odor complaints as defined in the SCAQMD CEQA Air Quality Handbook, as the parcels that neighbor the project site are not zoned for these uses. As discussed above, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people during construction or operations. Therefore, cumulative impacts related to the production of odors or other emissions would be **less than significant**.

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3.3 Biological Resources

This section addresses the potential biological resource impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to biological resources are also addressed. This section relies on the information and analysis in the Biological Technical Report prepared by HELIX (2026) and is provided as Appendix C to the EIR. The Biological Technical Report analyzes project impacts within a biological study area, which includes the approximately 1.1-acre project site and a 100-foot buffer, incorporating a total area of approximately 4.6 acres.

3.3.1 Environmental Setting

3.3.1.1 Vegetation and Land Use Types

A total of two vegetation communities (including land cover types) were recorded within the biological study area (Table 3.3-1, *Existing Vegetation Communities and Land Cover Types Within the Biological Study Area*; Figure 3.3-1, *Vegetation and Sensitive Biological Resources/Impacts*). They consist of two upland habitat/land cover types (disturbed habitat and developed), which are discussed in detail below.

Table 3.3-1
EXISTING VEGETATION COMMUNITIES AND LAND COVER TYPES WITHIN THE BIOLOGICAL STUDY AREA

Vegetation Community or Land Cover Type	MSCP Tier	Acreage[1,2]
Disturbed Habitat	--	1.1
Developed	--	3.5
	TOTAL	**4.6**

[1] Totals reflect rounding (0.1 for non-sensitive uplands).
[2] All portions of the study area are located outside of the Multi-Habitat Planning Areas (MHPA).
MSCP = Multiple Species Conservation Program

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present animal usage that removes any capability of providing viable habitat. This habitat, totaling 1.1 acres, is the only habitat within the biological study area. Characteristic species present include big heron's bill (*Erodium botrys*), coastal heron's bill (*Erodium cicutarium*), crete weed (*Hedypnois cretica*), and tocalote (*Centaurea melitensis*).

Developed

Developed land is where permanent structures, pavement, and/or gravel are present, which prevents the growth of vegetation, or where landscaping is clearly tended and maintained. Developed portions of the study area consist of the Miramar Hangar, access road, engine and aviation testing area, and parking area, together occupying a total of 3.5 acres of the biological study area.

3.3.1.2 Jurisdictional Resources

The project site does not contain any potentially jurisdictional resources. Two upland-cut, stormwater swales occur in the southern portion of the biological study area, outside of the project site (Figure 3.3-2, *Jurisdictional Delineation Results*). These maintained features were created to collect stormwater runoff from developed portions of the airport and are fully contained within the airport lands, with no off-site outfall, and are considered non-jurisdictional features. Two road ruts that have the potential to inundate for a period long enough to support fairy shrimp species occur in the southeastern portion of the study area; however, these road ruts lack any vegetation and would not be considered vernal pools. A formal jurisdictional delineation was not conducted for the project, as all potentially jurisdictional resources are outside of the impact footprint. Only the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) can make a final determination of jurisdictional boundaries.

3.3.1.3 Sensitive Plant and Animal Species

Sensitive plant and animal species (also referred to as "special-status species") include those listed as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA) or under the California Endangered Species Act (CESA) or the Native Plant Protection Act; Species of Special Concern identified by CDFW; state Watch List species; state Fully-protected species; or federal Bird of conservation Concern; plants occurring on Ranks 1 and 2 of the California Native Plant Society's California Rare Plant Rank system; City of San Diego Multiple Species Conservation Program (MSCP) or Vernal Pool Habitat Conservation Plan (VPHCP) Covered Species; or Narrow Endemic species as listed in the City of San Diego Biology Guidelines (City of San Diego [City] 2018). In addition, active nests of most bird species, regardless of sensitivity status, are protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game (CFG) Code. Plant and animal species within the biological study area include species either observed or documented during biological surveys or species listed with a potential to occur based on the presence of suitable habitat or known occurrences in the project vicinity.

No federally and state-listed plant species have been recorded within the biological study area, and none have a high or moderate potential to occur within the biological study area. Additionally, no other sensitive plant species were determined to have high or moderate potential to occur in the study area.

No federally or state-listed or federal or state candidate animal species were detected on-site during project surveys. One sensitive animal species, Belding's orange-throated whiptail (*Aspidoscelis hyperythrus beldingi*), was documented in the biological study area during the general biological survey. One federally listed endangered species, San Diego fairy shrimp, and one species proposed for federal listing as threatened, western spadefoot (*Spea hammondii*), have moderate potential to occur within the biological study area. One state candidate animal species, burrowing owl (*Athene cunicularia*) has moderate potential to occur within the biological study area during winter. Additionally, the project site contains suitable nesting habitat for several bird species, including raptors, protected under the MBTA and CFG Code. The potential for Crotch's bumble bee (*Bombus crotchii*) to occur at the project site is considered low, as the site lacks suitable floral resources for this species to use for nectar and is subject to regular maintenance and disturbance. The closest record of this species is approximately 3.5 miles east of the biological study area.



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Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Vegetation and Sensitive Biological Resources/Impacts

Figure 3.3-1



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Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Jurisdictional Delineation Results

Figure 3.3-2

Refer to Appendices A through D of Appendix C of this EIR for a complete list of plant species observed, animal species observed or detected, and sensitive plant and animal species with potential to occur within the biological study area.

3.3.1.4 Wildlife Corridors and Linkages

Wildlife corridors and linkages are linear spaces of undeveloped native habitats that connect both large and small natural open spaces and provide opportunities for wildlife movement on a local and regional scale. Wildlife corridors contribute to the sustainability of populations by providing access to larger areas of suitable habitat for dispersal, foraging, and mating. Linkages between wildlife corridors connect isolated blocks of habitat and allow movement or dispersal over a large scale and the mixing of genes between populations (i.e., gene pool diversity).

The biological study area is located outside of areas mapped as Multi-Habitat Planning Areas (MHPA) under the City's Subarea Plan (SAP) and is outside of areas conserved in the VPHCP (Figure 3.3-3, *MSCP Regional Context and VPHCP Data)*. The nearest MHPA is located approximately 525 feet northeast of the biological study area on the airport property. The biological study area contains a combination of disturbed habitat and developed land that is surrounded by adjacent development and does not provide adequate cover to function as a wildlife corridor or linkage.

The biological study area has been subject to continual disturbance since the airport was established, and as a result, supports a predominance of non-native plant species. No specific regional movement corridors have been identified within the biological study area or the larger airport property, although the undeveloped airport lands are used by a variety of native wildlife, including small to medium-sized mammals (e.g., coyotes), birds, and other wildlife. Lands surrounding the project site have been mostly developed for commercial uses or roads.

3.3.2 Regulatory Framework

A summary of federal, state, District, and local regulations that pertain to biological resources is provided below. No regional regulations regarding biological resources apply to the project.

3.3.2.1 Federal

Endangered Species Act

Administered by the USFWS, FESA provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the FESA Section 9(a), which defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in the federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The USFWS designates critical habitat for endangered and threatened species. The ultimate goal is to restore healthy populations of listed species within their native habitats, so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the FESA, federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in the destruction or adverse modification of the critical habitat.

Sections 7 and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 generally describes a process of federal interagency consultation and issuance of a biological opinion and incidental take statement when federal actions may adversely affect listed species. Section 10(a) generally describes a process for preparation of a Habitat Conservation Plan and issuance of an incidental take permit.

Migratory Bird Treaty Act

Migratory bird species that are native to the United States or its territories are protected under the federal MBTA, as amended under the Migratory Bird Treaty Reform Act of 2004. The MBTA is generally protective of migratory birds. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season. In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests. The Migratory Bird Treaty Reform Act requires the USFWS to publish a list of all nonnative, human introduced bird species to which the MBTA does not apply, and an updated list was published in 2020. The 2020 update identifies species belonging to biological families referred to in treaties the MBTA implements but are not protected because their presence in the United States or its territories is solely the result of intentional or unintentional human-assisted introductions.

Clean Water Act

The USACE regulates impacts to waters of the U.S. under Section 404 of the Clean Water Act (CWA; 33 USC 401 et seq.; 33 USC 1344; USC 1413; and Department of Defense, Department of the Army, Corps of Engineers 33 CFR Part 323). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. A federal CWA Section 404 Permit would be required for a project to place fill in waters of the U.S. Projects impacting waters of the U.S. could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed individually based on the type of action, amount of fill, etc. Individual permits typically require substantial time (often longer than one year) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions. A CWA Section 401 Water Quality Certification administered by the RWQCB must be issued prior to issuance of a Section 404 Permit.

3.3.2.2 State

California Endangered Species Act

Similar to the FESA, the CESA of 1970 provides protection to species considered threatened or endangered by the state of California (CFG Code, Section 2050 et seq.). The CESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

The CESA established that it is state policy to conserve, protect, restore, and enhance state endangered species and their habitats. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. The CESA authorizes that private entities may “take” plant or wildlife species listed as endangered or threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit if the CDFW certifies that the incidental take is consistent with CESA (CFG Code Section 2080.1[a]). For state-only listed species,



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Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

MSCP Regional Context and VPHCP Data

Figure 3.3-3

Section 2081 of CFG Code authorizes the CDFW to issue an Incidental Take Permit for state listed threatened and endangered species if specific criteria are met. The City was issued a take permit for their adopted MSCP SAP pursuant to Section 2081.

California Fish and Game Code

The CFG Code provides specific protection and listing for several types of biological resources. Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

3.3.2.3 District

District Design Guidelines and Standards Manual

The District's Design Guidelines and Standards Manual establishes District-wide requirements for the design and construction of District facilities. The manual includes specific tree and plant protection requirements that apply to construction work. These standards require that construction activities avoid and minimize damage to existing trees and vegetation through measures such as:

- Installation of protective fencing a minimum of 10 feet beyond the dripline of existing trees;
- Maintenance of tree health during construction, including irrigation and monitoring by a qualified arborist;
- Restrictions on grading, root pruning, and construction activities within protected root zones;
- Use of approved methods for pruning and root management under the direction of a certified arborist; and
- Replacement of trees of equal size and value if construction-related damage occurs.

The Design Guidelines and Standards Manual also includes requirements for tree placement, species selection, and installation, including minimum setbacks from infrastructure, use of approved or low-maintenance species, and standards for planting and establishment.

3.3.2.4 Local

Multiple Species Conservation Program Subarea Plan

Refer to Section 3.10.2.4 for discussion of the MSCP, MHPA, and MHPA Land Use Adjacency Guidelines.

Vernal Pool Habitat Conservation Plan

In October 2019, the City completed the VPHCP (City 2019), which is a comprehensive plan to provide conservation of vernal pool habitats and seven sensitive species that do not have coverage under the City's MSCP SAP. The VPHCP encompasses the entire City and MSCP SAP coverage area of approximately 206,124 acres, and includes some lands owned by the City that are within unincorporated San Diego County (i.e., Cornerstone Lands which include water supply areas for the City). Some lands within the City limits not under City jurisdiction (e.g., school districts, water districts, federal and state lands, etc.) are not automatically covered by the VPHCP; however, those landowners can seek coverage under the VPHCP through a Certificate of Inclusion.

In addition to authorizing take of sensitive vernal pool species, the VPHCP serves to expand the City's MHPA, with a focus on the management and conservation of vernal pool habitats and their associated species, particularly the covered species of the VPHCP. The VPHCP is comprised of three Planning Units; north, central, and south. The project site is located within the central planning unit of the VPHCP, but does not contain areas conserved under the VPHCP.

The seven species covered under the VPHCP are threatened and endangered species that do not have federal take coverage under the MSCP SAP and include five plants and two animals: Otay Mesa mint (*Pogogyne nudiuscula*), San Diego mesa mint (*Pogogyne abramsii*), Spreading navarretia (*Navarretia fossalis*), San Diego button-celery (*Eryngium aristulatum* var. *Parishii*), California Orcutt grass (*Orcuttia californica*), Riverside fairy shrimp (*Streptocephalus woottoni*), San Diego fairy shrimp (*Branchinecta sandiegonensis*).

As discussed in Section 4.2.7 of the VPHCP, federal aviation regulations require that the airport be maintained and operated in a manner that promotes the health, safety, and welfare of airport users, and the surrounding communities. As part of this mandate, the airport has required operations and standard activities that have the potential to impact covered species and/or vernal pool habitat. Table 4-7 of the VPHCP identifies these covered airport activities.

City of San Diego Environmentally Sensitive Lands Regulations

Environmentally Sensitive Lands (ESL) include sensitive biological resources such as MHPA, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2018) as outlined in the City's ESL Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 1). Impacts to biological resources within and outside of the MHPA must comply with the City's ESL Regulations, which serve to implement standards and requirements of CEQA, the California Coastal Act, and the MSCP.

The purpose of the ESL Regulations is to "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands." The regulations require that development avoid impacts to certain sensitive biological resources as much as possible, including, but not limited to: MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal and state listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. In addition to protecting wetlands, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect wetland-associated functions and values. While a 100-foot buffer width is generally required in the coastal zone and

recommended in areas outside the coastal zone, this width may be increased or decreased on a case-by-case basis in consultation with the City, CDFW, USACE, and USFWS (City 2018).

Biology Guidelines

In September 1999, the City's Biology Guidelines, part of the City's Land Development Manual, were adopted to aid in the implementation and interpretation of the ESL Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 1) and the OR-1-2 Zone (San Diego Municipal Code Chapter 13, Article 1, Division 2). The Guidelines were most recently updated in 2018. Section III of the Biology Guidelines serves as standards for the determination of impact and mitigation under CEQA and the California Coastal Act. The guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL Regulations.

City of San Diego General Plan

The General Plan presents goals and policies for biological resources in the Conservation Element, which aims to: protect and conserve the landforms, canyon lands, and open spaces; limit development of floodplains and sensitive biological areas, including wetlands, steep hillsides, canyons, and coastal lands; manage and/or minimize runoff, sedimentation, and erosion due to construction activity, in order to improve watershed management and water quality; manage wetland areas for natural flood control and preserve wetland areas; preserve areas within the MSCP and implement the goals and policies of the City's MSCP SAP; support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values; and work with private, state, and federal organizations or people to implement an effective wetland management system.

3.3.3 Thresholds of Significance

Thresholds used to evaluate potential biological resource impacts are based on CEQA Guidelines Appendix G. A significant biological resources impact could occur if implementation of the proposed project would:

1. 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 CDFW or USFWS;

2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS;

3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

4. 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;

5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

6. Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.3.4 Impact Analysis

3.3.4.1 Special-Status Species

Threshold 1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Impact Discussion

Direct Impacts

No sensitive plant species have been documented to occur within the biological study area, and no sensitive plant species have a high or moderate potential to occur within the impact area; therefore, the project would not result in direct impacts to any sensitive plant species.

The project would result in direct permanent impacts to 0.9 acre of disturbed habitat, which is currently occupied by Belding's orange-throated whiptail, a CDFW watch list species. Implementation of the project could impact habitat in use by Belding's orange-throated whiptail for foraging and breeding. Impacts to this species would be less than significant, as sufficient habitat to support the species would remain within the biological study area and surrounding lands, with higher quality habitat occurring off-site to the east of the proposed project that would not be impacted by the project. This species is highly mobile and capable of moving to other areas.

Three additional sensitive animal species that were not observed during the general biological survey have moderate potential to occur within the biological study area: San Diego fairy shrimp, western spadefoot, and burrowing owl. Crotch's bumble bee was determined to have low potential to occur at the project site based on lack of suitable floral resources and regular maintenance and disturbance of the site. None of the other sensitive animal species known to occur or with moderate or high potential to occur within the project requires avoidance or mitigation measures due to lack of anticipated impacts, their low sensitivity, and/or their ability to move out of the impact area.

San Diego fairy shrimp is a federally endangered and VPHCP-covered species. Implementation of the project could impact depressional features where San Diego fairy shrimp may persist within the biological study area. No known direct impacts are expected to occur to San Diego fairy shrimp, as the project would not impact the existing depressional features mapped within the biological study area; however, the biological study area could support additional areas that may pond sufficiently to support San Diego fairy shrimp that were not apparent during the February 2026 biological survey.

Western spadefoot is a federally proposed threatened species and a CDFW species of special concern; implementation of the project could impact the foraging habitat for western spadefoot.

In addition, burrowing owl is a state candidate endangered species, a federal bird of conservation concern, and a state species of special concern. Although the project is not situated in typically suitable habitat for the species, and the potential for burrowing owl to breed within the biological study area is

low, there is moderate potential for wintering burrowing owls to periodically forage within the biological study area.

Further, implementation of the project has the potential to impact nesting birds, which are protected under the MBTA and CFG Code, as some species nest in developed areas. Direct impacts to San Diego fairy shrimp, western spadefoot, burrowing owl, and nesting birds would be potentially significant. Therefore, implementation of the project would result in potentially significant direct impacts to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. **Direct impacts would be potentially significant prior to mitigation.**

Indirect Impacts

Indirect impacts can be short-term or long-term and include areas and activities adjacent to a project (i.e., edge effects). Examples of short-term indirect impacts include construction-related noises, dust, increased human presence, and hydrology modifications. Long-term indirect impacts primarily result from anthropogenic disturbances by humans, such as noise, lighting, domesticated animals, spread of non-native ornamental and weedy plant species, and urban runoff (including potentially toxic or hazardous chemicals).

Implementation of the project would not result in indirect impacts to biological resources in the MHPA, which is at a distance greater than 500 feet from project activities. However, project runoff would be directed away from the MHPA; BMPs would be implemented during construction to control runoff, erosion, and contaminants and to avoid intrusion of invasive plant species; and lighting would be shielded and directed away from MHPA/VPHCP Hardline area. The project, based on its distance from the MHPA, would not result in indirect impacts associated with drainage, toxins, lighting, noise, barriers, invasive plant species, brush management, or grading/land development.

The project would not result in substantial changes in lighting or human access in comparison to the baseline condition, since the biological study area is within and adjacent to existing developed areas that are already subject to these effects.

Implementation of standard construction Best Management Practices (BMPs) for erosion and sediment control (e.g., preservation of existing vegetation, mulching, hydroseeding, soil binding, silt fencing, fiber rolls, gravel bag berms, sweeping, sandbag barriers, storm drain inlet protection), conformance with state Construction General Permit requirements, and preparation of Storm Water Quality Management Plans, as applicable, would address potential indirect impacts resulting from dust, hydrology modifications, and stormwater runoff. **Indirect impacts would be less than significant.**

Mitigation Measures

San Diego Fairy Shrimp

BIO-1 **Ponding Checks and Fairy Shrimp Survey**. A USFWS-permitted fairy shrimp biologist shall conduct ponding checks after rain events with a minimum of 0.5 inch of rainfall within the study area in the winter/spring before construction, and conduct a USFWS protocol fairy shrimp survey in the two depressional features and any other features in the study area that inundate and hold water for one week following a rain event. Results of protocol fairy shrimp surveys shall be submitted to the District and USFWS. If ponding surveys indicate that potential

depressional features suitable for fairy shrimp are absent from the work area, then fairy shrimp surveys will not be required. If listed fairy shrimp are found within the proposed impact area, USFWS authorization would be required prior to impacting this species. Indirect impacts to listed fairy shrimp outside the work area would be addressed with resource protection in mitigation measure BIO-2 and construction monitoring in mitigation measure BIO-3.

BIO-2 **Resource Protection.** Before construction activities commence, a Qualified Biologist, as defined in the City Biology Guidelines (2018), shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats. This effort shall include delineating buffers to protect the sensitive biological resources (e.g., habitats/flora and fauna species) that shall be monitored during construction, consistent with mitigation measure BIO-3.

BIO-3 **Construction Monitoring.** All construction, including site preparation, demolition, grading, and staging areas, shall be restricted to the approved work area, and construction access will use established, previously disturbed areas. A biological monitor shall monitor construction activities as determined needed by the Qualified Biologist to ensure that construction activities do not encroach into biologically sensitive areas delineated in mitigation measure BIO-2, and that the work plan has been amended to accommodate any sensitive species subsequently discovered. The biological monitor will also document BMPs, including temporary construction fencing as outlined in mitigation measure BIO-2, and dust control.

Western Spadefoot

BIO-4 **Western Spadefoot Avoidance.** If construction cannot be conducted outside of the western spadefoot breeding season of October 1 to April 30, a Qualified Biologist as defined in the City Biology Guidelines (2018) shall conduct a three-day/three-night pre-construction western spadefoot survey within 30 days before the start of construction. For the remainder of the western spadefoot breeding season, a Qualified Biologist shall conduct a daytime and a nighttime check for western spadefoot following each rain event of at least one inch within 24 hours. Results of any western spadefoot surveys shall be submitted to the District and the City. If western spadefoot adults, eggs, tadpoles, or juveniles are observed during the pre-construction survey or subsequent visits, then work shall be halted until western spadefoot are confirmed absent or until the District implements avoidance buffers and other measures, such as toad exclusion fencing and relocation, as determined by the Qualified Biologist.

Burrowing Owl

BIO-5 **Burrowing Owl Preconstruction Surveys.** A Qualified Biologist as defined in the City Biology Guidelines (2018) shall conduct preconstruction surveys for burrowing owl in suitable burrowing owl habitat within 500 feet of the project impact area where an adverse direct or indirect impact could occur to the species as a result of construction activities, as determined by the Qualified Biologist. The pre-construction surveys shall include at least two surveys conducted at least seven days apart, with the first survey occurring no more than 14 days prior to initiating construction activities that might result in a direct or indirect impact to burrowing owl and the second survey occurring no more than 48 hours prior to initiating construction activities that might result in a direct or indirect impact to burrowing owl. The surveys shall be conducted using the methods described in protocols accepted by CDFW (the qualified biologist shall contact CDFW for up-to-date guidance). If no burrowing owls or occupied burrows are detected

during the pre-construction surveys, construction activities shall be allowed to proceed with no additional measures required. If burrowing owls and/or occupied burrowing owl burrows are detected during the pre-construction surveys, then the following additional measures shall be implemented.

a. If burrowing owls and/or occupied burrowing owl burrows are detected during the pre-construction surveys, the results of the survey, including a Burrow Complex Map, shall be summarized in a survey report and submitted to the District and CDFW prior to initiating construction activities within 500 feet of burrowing owl locations and/or occupied burrowing owl burrows. The Burrow Complex Map shall show the locations of all burrowing owl sightings, burrowing owl burrow complex(es), and atypical burrows (i.e., culverts, buckled concrete, etc.), and shall label if the sightings were identified as potential burrows, occupied burrows, satellite burrows, areas of concentrated burrows, and/or burrowing owl sign. If a lapse in construction activities occurs for 14 days or longer within 500 feet of burrowing owl sightings or occupied burrows, the project proponent shall contact the CDFW to determine if updated pre-construction surveys and an updated Burrow Complex Map are required prior to reinitiating construction activities with the potential to disturb burrowing owls;

b. Construction activities with the potential to result in direct or indirect adverse impacts on burrowing owls shall be avoided within approximately 500 feet of burrowing owls and/or occupied burrowing owl burrows at any time of the year to the extent feasible;

c. If construction activities with the potential to result in direct or indirect adverse impacts on burrowing owl cannot be avoided within 500 feet of burrowing owls and/or occupied burrows while burrowing owls are present at any time of the year, the following avoidance measures shall be implemented:

    i. During the burrowing owl breeding season (February 1 to August 31), an avoidance buffer of approximately 500 feet shall be established around all active burrowing owl nesting, roosting, and satellite burrows or the entire burrow complex. The avoidance buffer shall be delineated using stakes, flags, and/or rope or cord. The method of marking the buffer shall be adjusted if corvids, raptors, or other predators are observed perching on marking materials. The avoidance buffer shall be delineated with different materials from those used to delineate the limits of work. All materials used for delineation of the buffer shall be removed and properly disposed of following completion of construction activities, or when burrowing owls are no longer present and/or using the burrow(s). The distance of the avoidance buffer may be reduced where natural (hills, trees) or artificial (buildings, walls) barriers separate the location of construction activities from the active burrowing owl burrows. The final distance of the avoidance buffer shall be at the discretion of a qualified biologist.

    ii. During the burrowing owl non-breeding season (September 1 to January 31), an avoidance buffer of approximately 150 feet shall be established around all active burrowing owl wintering or roosting burrows or the entire burrow complex. The buffer shall be delineated using stakes, flags, and/or rope or cord. The method of marking the avoidance buffer shall be adjusted if corvids, raptors, or other

predators are observed perching on marking materials. The avoidance buffer shall be delineated with different materials from those used to delineate the limits of work. All materials used for delineation of the buffer shall be removed and properly disposed of following completion of construction activities, or when burrowing owls are no longer present and/or using the burrow(s). The distance of the avoidance buffer may be reduced where natural (hills, trees) or artificial (buildings, walls) barriers separate the location of construction activities from the active burrowing owl burrows. The final distance of the avoidance buffer shall be at the discretion of a qualified biologist.

d. If occupied and/or potentially suitable burrowing owl burrows occur within the direct impact area(s) and cannot be avoided by construction activities, the following measures shall be implemented:

   i. Construction activities shall avoid direct physical impacts to active burrowing owl nesting, roosting, and satellite burrows or the entire burrow complex during the burrowing owl breeding season (February 1 to August 31), or until a qualified biologist determined that nesting activities have ceased (i.e., nestlings have fully fledged, are feeding independently and are no longer dependent on the nesting burrow).

   ii. Burrowing owl exclusion and excavation of suitable burrowing owl burrows present within the direct impact area(s) may be conducted with approval of the CDFW once the burrow or burrow complex has been determined to be inactive, during the burrowing owl non-breeding season (September 1 to January 31), or if conducted during the burrowing owl breeding season (February 1 to August 31), only after the nestlings have fully fledged, are feeding independently, and are no longer dependent on the nesting burrow. Methods of burrow exclusion and excavation shall be determined in consultation with CDFW and may include such methods as: burrow monitoring to confirm status; burrow inspection through the use of camera scoping, trail camera, or alternative methods approved by CDFW; installation of one-way doors at the entrance of burrows to allow burrowing owl and other wildlife to vacate the burrows unharmed; or collapsing of vacated burrows.

   If direct or indirect adverse impacts cannot be avoided during the review period for burrowing owl as a candidate state endangered species or if burrowing owl is listed as a state endangered species, then the project proponent shall implement the additional measures below in compliance with the California Endangered Species Act. If the candidate state endangered listing is removed for the burrowing owl and the species does not become listed as a state endangered species, then the additional measures below for the California Endangered Species Act compliance would no longer be required.

e. Prior to the initiation of construction activities that could result in direct or indirect adverse impacts on burrowing owl, the project proponent shall consult with CDFW in accordance with the California Endangered Species Act. If take of burrowing owl is expected, no construction activities with the potential to result in direct or indirect

adverse impacts on burrowing owl shall occur until CDFW has authorized such take through an Incidental Take Permit, as applicable. The project proponent shall implement any required avoidance, minimization, and mitigation measures prescribed in the Incidental Take Permit, as applicable beyond what is being proposed under this CEQA analysis to reduce the impact to less than significant.

f. Prior to the initiation of construction activities that could result in direct physical impacts to active burrowing owl burrows and nest sites (i.e., destruction of burrows determined to be occupied by wintering, roosting, or nesting burrowing owl), a qualified biologist approved by CDFW shall be retained to help facilitate avoidance and minimization actions during project construction to ensure that burrowing owls are not harmed. The qualified biologist, in coordination with CDFW, shall assist with the implementation of measures to prevent direct take of burrowing owl individuals during construction. The CDFW-approved measures for ensuring the burrows do not support an active nest and individual owls are not entrapped within burrows that occur within the approved construction work areas shall include, at a minimum: burrow monitoring to confirm nesting status; burrow inspection through the use of camera scoping, trail camera, or alternative methods approved by CDFW; installation of one-way doors at the entrance of burrows to allow burrowing owl and other wildlife to vacate the burrows unharmed; collapsing of vacated burrows; inspection, removal, and/or concealment of pipes, debris/rock piles, and other areas that could attract burrowing owl onto the approved construction work areas; monitoring construction activities; and weekly reporting to CDFW.

Nesting Birds

BIO-6 **Nesting Birds Survey**. If grubbing, trimming, or clearing activities must occur within the general avian breeding season (February 15 through August 31), a Qualified Biologist shall perform a pre-construction nesting bird survey no more than seven days before the commencement of vegetation clearing or grubbing to determine if active bird nests are present in the affected areas. Results of the nesting bird survey(s) shall be submitted to the District and the City. Should an active bird nest be located, the project biologist shall direct vegetation clearing away from the nest until it has been determined by the project biologist that the young have fledged or the nest has failed. If there are no nesting birds (including nest building or other breeding/nesting behavior) within the proposed impact area, clearing, grubbing, grading, and tree removal shall be allowed to proceed.

Level of Significance After Mitigation

Implementation of mitigation measures BIO-1 through BIO-6 would reduce impacts related to sensitive species to a level that is **less than significant**.

3.3.4.2 Sensitive Habitats

Threshold 2: Would the project 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 CDFW or USFWS?

Impact Discussion

The project would result in direct, permanent impacts to 1.1 acres, consisting of 0.9 acres of disturbed habitat and 0.2 acres of developed land (refer to Figure 3.3-1). All impacts would occur outside of the MHPA. No impact to sensitive uplands would occur, as none are located within the biological study area. Implementation of the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS. **Impacts would be less than significant**. No mitigation is required.

3.3.4.3 Wetlands

Threshold 3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Discussion

No impact to wetlands would occur, as none are located within the biological study area. Implementation of the project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means. **No impact would occur**. No mitigation is required.

3.3.4.4 Wildlife Corridors

Threshold 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Discussion

There are no regionally identified wildlife corridors or habitat linkages in the biological study area. The project would entirely avoid impacts within the MHPA and would not create any barriers to wildlife movement within the MHPA or result in impacts to wildlife connectivity between the biological study area and other nearby areas. Implementation of the project would not 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. **Impacts would be less than significant**. No mitigation is required.

3.3.4.5 Local Policies or Ordinances

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Discussion

The District's Design Guidelines and Standards Manual includes enforceable requirements for the protection of existing trees and vegetation during construction, including installation of protective fencing, maintenance of tree health, restrictions on disturbance within root zones, and replacement of damaged trees. In addition, the City has tree preservation/street tree policies which require permits to allow trimming or removal of public trees depending on the tree type and location. However, the project site and the area along Kearny Villa Road where utility connection work would occur do not currently have any trees due to the airport location and subsequent landscaping restrictions. Therefore, these District and City tree policies would not apply to the project, and no local policy or ordinance conflicts are expected to arise with the implementation of the project. Refer to Section 3.3.4.6 below for a consistency discussion related to the MSCP, MHPA, and VPHCP. **No impact would occur**. No mitigation is required.

3.3.4.6 Conservation Plans

Threshold 6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact Discussion

The project does not propose development that would directly or indirectly affect the biological resources occurring on MHPA lands, and no impacts to the City's MSCP program would occur from the implementation of the project. Similarly, the project occurs within the central planning unit of the VPHCP, but outside of areas conserved under the VPHCP; thus, no significant regional conservation planning impact would occur. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community conservation Plan, or other approved local, regional, or state habitat conservation Plan. **Impacts would be less than significant**. No mitigation is required.

3.3.5 Cumulative Impact Analysis

The geographic scope for the biological resources cumulative analysis is San Diego County. In 1991, the State of California passed the Natural Community Conservation Act (NCCP) Act, providing for the long-term, regional conservation of natural vegetation and wildlife diversity. The MSCP Plan is the framework NCCP plan for southwestern San Diego County. The USFWS and CDFW jointly adopted the MSCP Plan in 1997. As part of that approval process, a Joint EIR/Environmental Impact Statement (EIS) was prepared, which addressed the cumulative impacts to biological resources from growth in the San Diego region. While the District is not an enrolled agency in the NCCP program, the Final MSCP Plan (City 1998) and its associated Joint EIR/EIS (City and USFWS 1996) were considered in the cumulative analysis below as they address regionwide biological resource impacts from development.

3.3.5.1 Special-Status Species

As described in the Joint EIR/EIS prepared for the MSCP Plan, implementation of the MSCP Plan would result in cumulatively significant direct impacts to its 85 covered species; however, assembly and management of the MHPA would reduce these cumulative impacts below a level of significance (City and USFWS 1996). Biological surveys for the project identified potential impacts to sensitive species. With implementation of mitigation measures identified to address these impacts and continued implementation of the regional habitat conservation network, incremental impacts to special-status species associated with the project **would not be cumulatively considerable**.

3.3.5.2 Sensitive Habitats

Cumulative development projects within or adjacent to areas containing sensitive habitat have the potential to result in the cumulative loss of sensitive habitats or natural communities; however, mitigation would be implemented that would result in no net loss of these communities on a regional scale. As discussed above, the project would not result in impacts to sensitive vegetation communities or habitat. As such, the project's cumulative impacts would be **less than significant**.

3.3.5.3 Wetlands

Cumulative development projects within or adjacent to wetlands have the potential to result in the cumulative loss of wetlands without adherence to regulatory permit requirements. Cumulative development projects would be required to implement mitigation according to permit conditions prescribed by the regulatory agencies. The project would not result in any impacts to wetlands, and thus, wetland impacts **would not be cumulatively considerable**.

3.3.5.4 Wildlife Corridors

Cumulative development projects occurring within existing wildlife corridors and inhibiting movement through these areas have the potential to result in the cumulative loss of wildlife corridors and associated breeding areas. As discussed above, there are no regionally identified wildlife corridors or habitat linkages in the project's biological study area. Therefore, project impacts related to wildlife corridors **would not be cumulative considerable**.

3.3.5.5 Local Policies or Ordinances

Implementation of cumulative development would be required to comply with the applicable agencies' local policies or ordinances, including those identified in the San Diego Municipal Code for property within City jurisdiction and the District's tree planting and preservation policies, for projects within the District's jurisdiction. Compliance with these local policies would ensure that development does not result in the cumulative loss of local biological resources such as trees. Therefore, cumulative impacts related to conflicts with local policies or ordinances would be **less than significant.**

3.3.5.6 Conservation Plans

As part of the MSCP planning process, lands were identified for assembly into a comprehensive preserve for the conservation of biological resources. That preserve is referred to as the MHPA and was cooperatively designed by the participating jurisdictions and special districts in the MSCP study area in partnership with the wildlife agencies (CDFW and USFWS), property owners, and representatives from

private industry and environmental groups. The MHPA conserves vacant land, including habitat and other vacant lands that contribute to the preserve design. As noted above, implementation of the MSCP Plan would result in cumulatively significant direct impacts to the 85 covered species (City and USFWS 1996). Assembly and management of the MHPA as part of the MSCP and other NCCP plans would reduce these cumulative impacts to less than significant levels. Cumulative indirect impacts to native vegetation communities associated with edge effects and increased development pressure outside the MHPA were not considered significant due to the measures in the plans that address these effects. While the proposed project would not be subject to the MSCP, nearby cumulative development projects would be required to adhere to the applicable regulations of the MSCP or applicable subarea plan. As such, the project's contribution to significant cumulative impacts related to the MSCP **would not be cumulatively considerable**.

3.4 Cultural Resources

This section addresses the potential cultural resource impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to cultural resource are also addressed. This section relies on the information and analysis in the Historical Resource Technical Report (IS Architecture 2025) and a Peer Review Assessment of the Historical Resource Technical Report (HELIX 2026a), which are provided as Appendix D1 and D2 to the EIR, respectively. This section additionally relies on the information and analysis in the Cultural Resources Technical Report (HELIX 2026b), which is provided as Appendix E to the EIR. Tribal cultural resource impacts are discussed in Section 3.14, *Tribal Cultural Resources*.

3.4.1 Environmental Setting

Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, and/or scientific importance. Significant cultural resources are designated as "historical resources," and are defined per Public Resources Code (PRC) 21084.1 and CEQA Guidelines Section 15064.5. For the purposes of this EIR, discussion of historical resources is divided between built environment or historic resources, which consist of historic buildings, structures, objects, or sites, and archaeological resources, which refers to prehistoric or historic archaeological resources or human remains.

Cultural resources cannot be adequately evaluated without first taking into consideration the historic context(s) with which they are associated. The cultural history in San Diego County presented below is based on documentation from both the archaeological and ethnographic records and represents a continuous human occupation in the southern California region spanning approximately 12,000 years. While this information comes from the scientific reconstructions of the past, it does not necessarily represent how the Kumeyaay see themselves. While the material culture of the Kumeyaay is contained in the archaeological record, their history, beliefs, and legends have persevered, and are retained in the songs and stories passed down through the generations. It is important to note that Native American aboriginal lifeways did not cease at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas. More detailed historic contexts are provided in the Historical Resource Technical Report and Cultural Resources Technical Report (refer to Appendices D1 and E to the EIR).

3.4.1.1 Prehistoric Period

While historical and modern disturbance has eliminated the natural vegetation in the project area, before such disturbance, the natural vegetation in the project area and vicinity likely consisted mostly of coastal sage scrub (Diegan coastal sage scrub) and native grassland, along with chamise chaparral, baccharis scrub, southern willow scrub, and vernal pool communities. Plants of the coastal sage scrub community, such as California sagebrush (*Artemisia californica*), white sage *(Salvia apiana*), flattop buckwheat (*Eriogonum fasciculatum*), broom baccharis (*Baccharis sarothroides*), wild onion (*Allium haematochiton*), laurel sumac (*Malosma laurina*), San Diego sunflower (*Bahiopsis laciniata*), golden-yarrow (*Eriophyllum confertiflorum*), sawtooth goldenbush (*Hazardia squarrosa*), yucca (*Yucca schidigera*, *Hesperoyucca whipplei*), prickly pear cactus (*Opuntia* sp.), and scrub oak (*Quercus dumosa*), would likely have covered most of the mesa and canyons in the area, interspersed with areas of native grasslands (*Stipa* spp.*, Elymus* spp.*, Poa* spp.*, Muhlenbergia* spp.) (Beauchamp 1986; Munz 1974). Before historic and modern activities, adjacent major drainages such as the San Diego River contained extensive

stands of the riparian community with plants such as western sycamore (*Platanus racemosa*), Fremont cottonwood (*Populus fremontii*), coast live oak (*Quercus agrifolia*) and willow (*Salix* sp.) (Beauchamp 1986; Munz 1974). Major wildlife species found in this environment before European contact were coyote (*Canis latrans*), mule deer (*Odocoileus hemionus*), grizzly bear (*Ursus arctos horribilis*), mountain lion (*Puma concolor*), desert cottontail (*Sylvilagus audubonii*), black-tailed jackrabbit (*Lepus californicus*), and various rodents, the most notable of which are the Botta's pocket gopher (*Thomomys bottae*), California ground squirrel (*Otospermophilus beecheyi*), and dusky-footed woodrat (*Neotoma fuscipes*) (Head 1972). Many of these plant and animal species naturally occurring in the area and vicinity are known to have been used by native populations for food, medicine, tools, ceremonial, and other uses.

3.4.1.2 Ethnohistoric Period

The Ethnohistoric Period, sometimes referred to as the ethnographic present, commenced with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay. The coastal Kumeyaay died from introduced diseases or were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways. These accounts were often based on limited interviews or biased data collection techniques. Later researchers and local Native Americans began to uncover and make public the significant contributions in the understanding of native culture and language. These studies have continued to the present day and involve archaeologists and ethnographers working in conjunction with Native Americans to address the continued cultural significance of sites and landscapes across San Diego County.

The project area is located within the traditional territory of the Kumeyaay, also known as Ipai, Tipai, or Diegueño (named for Mission San Diego de Alcalá). At the time of Spanish contact, Kumeyaay bands occupied southern San Diego and southwestern Imperial counties, and northern Baja California. The Kumeyaay are a group of exogamous, patrilineal territorial bands that lived in semi-sedentary, politically autonomous villages or rancherias. Most rancherias were the seat of a clan, although it is thought that, aboriginally, some clans had more than one rancheria and some rancherias contained more than one clan. Several sources indicate that large Kumeyaay villages or rancherias were located in river valleys and along the shoreline of coastal estuaries. The people subsisted on a hunting and foraging economy, exploiting San Diego's diverse ecology throughout the year; coastal bands exploited marine resources while inland bands might move from the desert, ripe with agave and small game, to the acorn-and pine nut-rich mountains in the fall.

At the time of Spanish colonization in the late 1700s, several major Kumeyaay villages were located in proximity to the project area. The closest was the village of *Nipaquay* located along the north side of the San Diego River at the second and final location of the San Diego Mission de Alcalá, approximately three miles southeast of the project area. Other nearby villages include *La Rinconada de Jamo* (Rinconada), located approximately 4.35 miles west where the Rose Canyon drainage enters into Mission Bay; and the village of *Cosoy*, located along the south side of the San Diego River near the location of the San Diego Presidio and the first location of the Mission San Diego de Alcalá, approximately 4.3 miles south of the project area. A fourth nearby village, indicated to also be located along the lower San Diego River, was the village of *Sinyeweche* to the east of the village of *Nipaquay*.

The presence of these Kumeyaay villages such as *Nipaquay* and *Cosoy* at or near the locations of early Spanish facilities was not accidental. The Spaniards chose these locations because there were native

villages present in proximity. It is likely that the Kumeyaay people used the San Diego River valley, as well as Rose Canyon and its tributaries, as travel corridors from interior coastal plain areas, to and from villages located along, and at the mouth of, the river, such as *Cosoy, La Rinconada de Jamo, Nipaquay*, and *Sinyeweche* as well as other villages along the coast and to the north of the river and the project area, including *Ystagua*, *Peñasquitos*, and *Pawai/Pawaii/Paguay*.

3.4.1.3 Historic Period

Spanish Period

While Juan Rodríguez Cabrillo visited San Diego briefly in 1542, the beginning of the historic period in the San Diego area is generally given as 1769. In the mid-eighteenth century, Spain had escalated its involvement in California from exploration to colonization and, in that year, a Spanish expedition headed by Gaspar de Portolá and Junípero Serra established the Royal Presidio of San Diego. Portolá then traveled north from San Diego, seeking suitable locations to establish military presidios and religious missions to extend the Spanish Empire into Alta California.

Initially, both a mission and a military presidio were located on Presidio Hill overlooking the San Diego River. A small pueblo, now known as Old Town San Diego, developed below the presidio. The Mission San Diego de Alcalá was constructed in its current location five years later. The missions and presidios stood, literally and figuratively, as symbols of Spanish colonialism, importing new systems of labor, demographics, settlement, and economies to the area. Cattle ranching, animal husbandry, and agriculture were the main pursuits of the missions.

Mexican Period

Although Mexico gained its independence from Spain in 1821, Spanish patterns of culture and influence remained for a time. The missions continued to operate as they had in the past, and laws governing the distribution of land were also retained in the 1820s. Following the secularization of the missions in 1834, large ranchos were granted to prominent and well-connected individuals, ushering in the Rancho Era, with the society making a transition from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. With the numerous new ranchos in private hands, cattle ranching expanded and prevailed over agricultural activities.

These ranches put new pressures on California's native populations, as grants were made for inland areas still occupied by the Kumeyaay, forcing them to acculturate or relocate farther into the backcountry. In rare instances, former mission neophytes were able to organize pueblos and attempt to live within the new confines of Mexican governance and culture. The most successful of these was the Pueblo of San Pasqual, located inland along the San Dieguito River Valley, founded by Kumeyaay who were no longer able to live at the Mission San Diego de Alcalá

American Period

American governance began in 1848, when Mexico signed the Treaty of Guadalupe Hidalgo, ceding California to the United States at the conclusion of the Mexican–American War. A great influx of settlers to California and the San Diego region occurred during the American Period, resulting from several factors, including the discovery of gold in the state, the end of the Civil War, the availability of free land through the passage of the Homestead Act, and, later, the importance of San Diego County as an agricultural area supported by roads, irrigation systems, and connecting railways. The increase in

American and European populations quickly overwhelmed many of the Spanish and Mexican cultural traditions and greatly increased the rate of population decline among Native American communities.

By the 1890s, the City entered a time of steady growth, and subdivisions surrounding downtown were developed. As the City continued to grow in the early twentieth century, the downtown's residential character changed. Streetcars and the introduction of the automobile allowed people to live farther from their downtown jobs, and new suburbs were developed.

In 1914, the San Diego Community College District was established when the first two-year post-secondary course of study was established in San Diego. Because this was an extension of the public high school program, the Junior College classes were taught in San Diego High School; there were four instructors and 35 students in the first year of classes. By 1916, the faculty grew to 16 instructors, and all of the original students had graduated and entered the university as juniors.

The influence of military development, beginning in 1916 and 1917 during World War I, resulted in substantial development in infrastructure and industry to support the military and accommodate soldiers, sailors, and defense industry workers. In 1917, the U.S. Army established Camp Kearny on the site of what is now Marine Corps Air Station Miramar. Camp Kearny was named after Brigadier General Stephen W. Kearny, who was instrumental in the Mexican–American War. In 1943, Camp Kearny was commissioned as the Naval Auxiliary Air Station Camp Kearny; it continued to operate until 1946, when it was transferred to the United States Marine Corps.

Little development occurred within the City north of the San Diego River until the 1940s, when military housing was developed in Linda Vista. As part of the housing development, the federal government extended water and sewer pipelines to the Linda Vista area and improved public facilities. From Linda Vista, urban development spread north to the Kearny Mesa area. Established in 1937, the Montgomery-Gibbs Executive Airport (MYF) was one of the first modern developments to occur within the area. The airport began as a private flying field owned and operated by William "Bill" Gibbs Jr. Gibbs Field initially had one 1,200-foot runway; however, in 1939, three dirt landing strips were constructed. In 1940, the field was leased to the Ryan School of Aeronautics for Army Air Corps cadet training. The school expanded the runways at the field and likely constructed ancillary buildings and barracks for the cadets. During World War II, Gibbs temporarily moved to Arizona to continue working as a flight instructor, and Gibbs Field was used as a training ground for bombing exercises and simulated battles. After the war ended, Gibbs returned to San Diego and, by 1950, the airport had grown to include several airplane hangars.

In 1947, the City acquired 1,500 acres in Kearny Mesa, including Gibbs Field, and made several improvements to the runways and facilities, including two asphalt runways and taxiways. The City dedicated the field in 1950 as Montgomery Field in honor of John J. Montgomery who, in 1883, had made the first controlled wing flight in a "heavier-than-air" fixed-wing aircraft in the Otay Mesa area of the City. As part of the land acquisition, Gibbs was granted a lease of 15 acres, where he continued to operate his aviation business. Gibbs maintained his responsibilities as operator of the new airport until 1954 when the City took control of the field.

The 1950s saw the beginning of widespread industrial development within the study area. General Dynamics constructed facilities in the late 1950s to support research, development, and manufacture of the Atlas Missile for the United States Air Force, and several other aerospace, electronics, and other industrial companies constructed buildings in the community. In 1948, the Cabrillo Parkway, now SR

163, was constructed as U.S. Highway 395 and between 1953 and 1964, a new two-lane highway was constructed in the present-day location of Interstate 15. Additional development within Montgomery Field occurred in the 1960s with the construction of an Air Traffic Control Tower in 1965 and a new parallel runway and administration building in 1969. During the 1960s, the project vicinity saw huge increases in residential, commercial, and infrastructure development, which has been reflected into the present time.

On February 21, 1961, the Board of Education voted to rename San Diego Junior College to San Diego City College. The 1960s also saw a boom in enrollment at City College which exceeded capacity of the existing facility. The San Diego Unified School District (SDUSD), which managed the junior college at the time, exchanged some unused city-center property with the City of San Diego for approximately 145 acres of vacant land in Kearny Mesa. This new college, the Kearny Mesa Junior College, now known as San Diego Mesa College, opened in 1962 with an enrollment of 1,400 students.

SDUSD acquired the location for the Miramar Campus, located on the 120-acre Navy Hourglass Field, as a surplus property donation from the City in 1965. In 1969, the Miramar Regional Occupational Training Center accepted its first students. This college, which would later be known as San Diego Miramar College, was geographically the largest of the colleges and offered courses in programs in criminal justice and fire science and operated the police and sheriff's academies. During this growth and expansion period, San Diego's community college system was administered by SDUSD. In 1972, the San Diego Community College District was formed and began administering the campuses.

In 1985, a hotel and golf course were constructed in the southwest corner of the airport property. Following the completion of the FAA Automated Flight Service Station in 1987, the airport has served more than 60 public airports in San Diego and Imperial Counties. The San Diego City Council passed a resolution on January 28, 2016, changing the name of the airport to Montgomery-Gibbs Executive Airport to honor Bill Gibbs. While the airport is unable to handle major jet-passenger airplanes due to safety concerns, it is now a very well-transited General Aviation airport and has been classified by the FAA as a reliever airport for San Diego International Airport-Lindbergh Field. The Gibbs family owned and operated the Gibbs Flying Service, providing aviation services at the airport. However, in 2020 the lease with the City of San Diego expired.

3.4.1.4 Native American Contact Program

Preparation of the project Cultural Resources Technical Study included contacting the Native American Heritage Commission (NAHC) for a Sacred Lands File search and list of Native American contacts for the project area. The NAHC indicated that the results of the search were positive and to contact the Viejas Band of Kumeyaay Indians for more information. Letters were sent on March 30, 2026, to Native American representatives and interested parties identified by the NAHC. To date, one response has been received. On March 31, 2026, the Viejas Band of Kumeyaay Indians noted that the project area may "contain many sacred sites to the Kumeyaay people" and requested that the sites be avoided with adequate buffer zones. Additionally, Viejas requested that all pertinent state and federal laws and regulations be followed, and to be informed of any project changes or inadvertent discoveries.

3.4.1.5 Archaeological Resources

A records search of the California Historical Resources Information System (CHRIS) for the project and a surrounding 1-mile radius at the South Coastal Information Center (SCIC) identified 15 cultural resources

within the search area, consisting of 3 precontact archaeological sites, 1 precontact isolate, and 11 are built environment resources. One resource was identified within the project site, consisting of a historic-era building (discussed further in Section 3.4.1.6 below). One other recorded resource (SDM-W-155) includes an over 20-square-mile area of Kearny Mesa. SDM-W-155 was recorded by Malcom Rogers of the San Diego Museum of Man in the 1920s as the entirety of Kearny Mesa, including the Linda Vista, Clairemont, University City, Kearny Mesa, and Miramar community areas, and was described as dispersed highland winter camps with scattered artifacts and cobble hearths. Due to the unspecified locational data for individual features or artifact finds associated with this resource, no information is available to address what elements may have existed within or adjacent to the project area of potential effects.

A pedestrian survey of the project site was conducted by an archaeologist and a Kumeyaay Native American monitor. Visibility during the survey was excellent, with much of the area cleared of vegetation and heavily disturbed by grading and vehicle activity. No archaeological resources were identified during the pedestrian survey.

3.4.1.6 Built Environment Resources

Miramar Hangar (Building 8)

The project site contains the existing Miramar Hangar (identified as Building 8 in the Historical Resource Technical Report and Peer Review Assessment of the Historical Resource Technical Report). The Miramar Hangar was assembled on site and is estimated to have been built between 1947 and 1950 using military surplus parts. The Miramar Hangar represents the early period of MYF (1947-1950). It, along with buildings outside of the project site (Buildings 6 and 7, discussed below), housed businesses driving the development of the airport and the subsequent growth of Kearny Mesa as an industrial and then residential/commercial community, thus possessing significance at the local level. Therefore, the existing Miramar Hangar is eligible for listing in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and San Diego Register of Historical Resources (SDRHR). Therefore, it is considered a historical resource for the purposes of CEQA.

The Miramar Hangar is a steel-frame aircraft hangar with a box-like massing and a gable end roof is composed of corrugated steel panels. Oriented eastward, the hangar's primary elevation faces towards the MYF runways and taxiways. The primary elevation features a large, exterior, four panel, horizontal sliding hangar door system with a steel top track that extends out past the building at both ends of the elevation to vertical supports. Angled steel braces also appear to either side of building to provide additional support for the large door system. The sliding hangar door panels are corrugated steel panels covered in failing paint. The exterior wall within the gable end above the hangar door comprises the same corrugated steel panels and features a single, centered, light fixture. The south elevation is composed entirely of uninterrupted corrugated steel panels covered in failing paint. The west, or rear, elevation also features a completely uninterrupted wall surface composed of corrugated steel panels; however, five, evenly spaced, light fixtures project from the exterior within the gable end. The north elevation features a mostly uninterrupted wall surface composed of corrugated steel panels covered in failing paint. A flush, outward swinging, steel door appears near the western corner of the north elevation.

Buildings 6 and 7 (Off-Site)

Adjacent to the north of the project site are two additional structures that have been determined to be historic resources. Directly adjacent to the project site to the north is the Spiders Aircraft Services Inc. building (identified as Building 7 in the Historical Resource Technical Report). To the north of that is another structure, identified as Building 6 in the Historical Resource Technical Report. Building 6 is a single-story, pre-fabricated, steel-frame aircraft hangar with a semi-cylindrical massing, while Building 7 is a wood-framed aircraft hangar with a box-like massing. These buildings, (along with Miramar Hangar, discussed above) represent the early period of MYF (1947-1950), as described above, thus possessing significance at the local level. Buildings 6 and 7 are eligible for listing in the NRHP, CRHR, and SDRHR. Therefore, they are considered historical resources for the purposes of CEQA. Refer to Appendix D1 for additional details regarding these two buildings.

Eligibility as a District

A "District" for the purposes of the National Register is defined in 36 CFR 60.3(d) as *"…a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history*." Because no official boundary could be determined for the three buildings evaluated, the boundaries of the evaluation were approximated based on existing boundaries and historic photographs. Due to the inability to determine an official boundary, and the lack of geographic separation, a District as defined by the National Register does not exist at the site surveyed, which included Miramar Hangar and Buildings 6 and 7.

3.4.2 Regulatory Framework

A summary of federal, state, and local regulations that pertain to cultural resources is provided below. No regional or District regulations regarding cultural resources apply to the project.

3.4.2.1 Federal

National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act (NHPA) of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in 36 CFR 60. A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons important in our past;

C. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property.

Integrity is the ability of a property to convey its significance. Within the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity as defined below:

- Location: The place where the historic property was constructed or the place where the historic event occurred.
- Setting: The physical environment of a historic property.
- Design: The combination of elements that create the form, plan, space, structure, and style of a property.
- Materials: The physical elements that were combined or deposited during a particular period of time and in a pattern or configuration or form a historic property.
- Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling: The property's expression of the aesthetic or historic sense of a particular period of time.
- Association: The direct link between an important historic event or person and a historic property.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of project evaluation.

3.4.2.2 State

California Environmental Quality Act

The CEQA Guidelines (Section 15064.5) address determining the significance of impacts to archaeological and historic resources. Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, and/or scientific

importance (California Office of Historic Preservation 1995). Significant resources are considered "historical resources," and are defined per PRC Section 21084.1 and CEQA Guidelines Section 15064.5 as follows:

- Resource(s) listed or determined eligible by the State Historical Resources Commission for listing in the CRHR (CEQA Guidelines Section 15064.5[a][1]);

- Resource(s) either listed in the NRHP or in a "local register of historical resources" or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless "the preponderance of evidence demonstrates that it is not historically or culturally significant" (CEQA Guidelines Section 15064.5[a][2]); or

- Resources determined by the Lead Agency to meet the Criteria for listing on the CRHR (CEQA Guidelines Section 15064.5[a][3]).

It is important to note under CEQA Guidelines Section 15064.5(a)(4), a resource may also be considered an "historical resource" for the purposes of CEQA at the discretion of the lead agency, despite ineligibility recommendations.

For listing in the CRHR, a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2) It is associated with the lives of persons important to local, California, or national history;

3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values;

4) It has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation.

All resources nominated for listing must have integrity, which is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. A resource must also be judged with reference to the particular criteria under which it is proposed for nomination.

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). Certain properties, including those listed in or formally determined eligible for listing in the NRHP, and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points

of Historical Interest program, identified as significant in historic resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR.

A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled after the NRHP criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- Criterion 2: It is associated with the lives of persons important to local, California, or national history;
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or
- Criterion 4: It has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation (PRC Section 5024.1[c]).

Under CEQA Guidelines Section 15064.5(a)(4), a resource may also be considered a "historical resource" for the purposes of CEQA at the discretion of the lead agency.

Significant resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Resource integrity, which is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance, is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. In an archaeological deposit, integrity is assessed with reference to the preservation of material constituents and their culturally and historically meaningful spatial relationships. A resource must also be judged with reference to the particular CRHR/NRHP criteria under which it is proposed for eligibility.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act, like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5 state that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

California Public Resources Code Section 5097.98

PRC Section 5097.98 and CEQA Guidelines Section 15064.5 state that the NAHC, upon notification of the discovery of Native American human remains pursuant to California Health and Safety Code Section 7050.5, shall immediately notify those persons that it believes to be descended from the deceased (i.e., the most likely descendant [MLD]). With permission of the landowner or an authorized representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

3.4.2.3 Local

City of San Diego Historical Resources Regulations

The purpose of the City's Historical Resources Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures, historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles, and the rights of private property owners. For development projects regulated by the City, these regulations apply to proposed development when the following historical resources are present on the site: designated historical resources, historical buildings, historical districts, historical landscapes, historical objects, historical structures, important archaeological sites, and traditional cultural properties.

City of San Diego Historical Resource Guidelines

The purpose and intent of the City's Historical Resources Guidelines, located in the City's Land Development Manual, are to protect, preserve, and, where damaged, restore the historical resources of San Diego. These guidelines are designed to implement the City's Historical Resource Regulations in compliance with applicable local, state, and federal policies and mandates, including, but not limited to, the City's General Plan, CEQA, and Section 106 of the NHPA. The intent of the Historical Resource Guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation, and development. The Historical Resource Guidelines state that if a project will potentially impact a resource 45 years or older, the resource's significance must be determined, even if it is not listed in or previously considered eligible for the CRHR or a local register (Land Development Manual Section II.D.5).

To be designated as historic and potentially listed in the SDRHR, one or more of the following criteria must be met:

A. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;

B. Is identified with persons or events significant in local, state, or national history;

C. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;

D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

E. Is listed, or has been determined eligible by the National Park Service for listing on the NRHP, or is listed or has been determined eligible by the California State Office of Historic Preservation for listing on the CRHR; and/or

F. Is a finite group of resources related to one another in a clearly distinguishable way, or is a geographically definable area or neighborhood, containing improvements that have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

In addition to meeting one or more of the above criteria, an SDRHR-eligible resource must also retain sufficient integrity to convey its significance. Although the San Diego Municipal Code uses a 45-year threshold to review resources that may be adversely affected by development, a resource need not be 45 years of age to be eligible for listing on the SDRHR.

Eligible resources, which may include an improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object, are designated to the SDRHR by the City's Historical Resources Board at a publicly noticed hearing.

3.4.3 Thresholds of Significance

Thresholds used to evaluate potential cultural resources impacts are based on CEQA Guidelines Appendix G. A significant cultural resources impact could occur if implementation of the proposed project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

3. Disturb any human remains, including those interred outside of formal cemeteries.

While historical resources are broadly defined under CEQA Guidelines Section 15064.5 to include multiple resource types, for clarity of this impact analysis, built environment historical resources are addressed under Threshold 1 in Section 3.4.4.1 and archaeological historical resources are addressed under Threshold 2 in Section 3.4.4.2.

3.4.4 Impact Analysis

3.4.4.1 Historical Resources (Built Environment)

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact Discussion

Eligibility for Listing

The Miramar Hangar (identified as Building 8 in the Historical Resource Technical Report and Peer Review Assessment of the Historical Resource Technical Report) is located on the project site, and adjacent Buildings 6 and 7 are significant under NRHP Criterion A at the local level as they are associated with a pattern of important events that not only shaped the historical development of MYF, but, by extension, influenced the entire development of the community of Kearny Mesa. Among others, these events include the first private development in the area, the development of Gibbs Field between its founding in 1937 to 1947, San Diego's acquisition of the field in 1947, the annexation of the field by the City in 1948, the expansion and dedication of the airport as Montgomery Field in 1950, the ordinances that zoned Kearny Mesa for industrial and commercial uses in the 1950s, and the attraction of various types of companies to the area from at least 1947 to 1989 and later. The period of significance under Criterion A is 1947-1950. The period of significance is based on the buildings' appearance and construction on the site and coincides with San Diego's acquisition (1947), annexation (1948), and the expansion and dedication of the airport (1950).

The Miramar Hangar and Buildings 6 and 7 are significant under CRHR Criterion 1, with 1947-1950 being the period of significance. The period of significance is based on the buildings' appearance and construction on the site and coinciding with San Diego's acquisition (1947), annexation (1948), and the expansion and dedication of the airport (1950). Additionally, Building 6, embodying the distinctive characteristics of the Quonset Hut in the postwar Civilian reuse era, is significant under CRHR Criteria 3 with a period of significance of 1947, its earliest identifiable appearance at Montgomery Field.

Lastly, the Miramar Hangar and Buildings 6 and 7 are significant under SDRHR Criterion A because they reflect special elements of Kearny Mesa's historical development. They reflect the airfield created by Bill Gibbs, which was the earliest known development in Kearny Mesa. As such, they influenced both the development of Montgomery Field, presently named MYF, which by extension, influenced the development of the entire community of Kearny Mesa. Building 6 is also significant under Criterion C as it embodies the distinctive characteristics of the Quonset Hut.

The Miramar Hangar and Buildings 6 and 7 are significant under NRHP Criterion A/CRHR Criterion 1/SDRHR Criterion A, as discussed above and Building 6 is significant under NRHP Criterion C/CRHR Criterion 3/SDRHR Criterion C. In addition, the Miramar Hangar and Buildings 6 and 7 retain integrity of location, setting, design, materials, workmanship, feeling, and association to convey their significance.

As discussed in Section 3.4.1.6, the three evaluated structures do not qualify as a historic district, as defined by the National Register, due to the inability to determine an official boundary, and the lack of geographic separation.

Direct Impacts

Under CEQA, a significant effect to a historical resource is one that "may cause a substantial adverse change in the significance of a historical resource" (§15064.5[b]). A substantial adverse change may include "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (§15064.5[b][1]). As the proposed project would result in the demolition of the Miramar Hangar, direct impacts to historical resources (built environment) are identified as **potentially significant prior to mitigation**.

Indirect Impacts

The project would not have indirect impacts on Building 6 because of its distance from the project and because Building 7 separates the project site from Building 6. The project would not have indirect impacts on Building 7 because there would be approximately 80 feet between Building 7 and the new building proposed for the project. Additionally, the height of the project, at 32 feet, would only be a few feet taller than Building 7. The project would also retain the existing tarmac that spans across the east sides of Buildings 6, 7, and the project, thus preserving the key setting of the aviation-related properties. For these reasons, indirect impacts to historical resources (built environment) would be **less than significant.**

Mitigation Measures

As stipulated in California Code of Regulations (CCR) Title 14 Section 4852(d)(1) retention of a historical resource in its original location is encouraged. However, relocation may be acceptable to prevent demolition provided the resource retains its ability to convey its significance and thus eligibility for the CRHR. This may be achieved if 1) the move prevents demolition and 2) the new location is compatible with the original character and use of the historical resource. The resource should retain its character-defining features and compatibility in orientation, setting, and environment. Refer to Section 6.0, *Project Alternatives*, for a discussion of a project alternative that includes relocation of the Miramar Hangar.

Additionally, as defined in CCR Title 14 Section 15126.4(b)(2), "in some circumstances, documentation of a historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur" (CCR, Title 14, Division 6, Chapter 3, Section 15126.4[b][2]). However, pursuant to the PRC, documentation of a historical resource, by way of historic narrative, photographs, or architectural drawings, can still serve to reduce the effect of the demolition of the resource, even though it will not mitigate the effects to the point where clearly no significant effect on the environment would occur. Thus, "CEQA [the California Environmental Quality Act] requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance. In this context, recordation serves a legitimate archival purpose" (State of California 2026). The following mitigation measures would reduce potential impacts on historic resources to the extent feasible:

HIST-1 HABS Documentation. The District shall commission the preparation of Historic American Buildings Survey (HABS) Level II documentation by a qualified architectural historian for any historical resource that would be impacted by the project. Documentation of the existing conditions shall be undertaken prior to the commencement of demolition/construction in accordance with the Level II documentation procedures. Level II documentation shall include select existing drawings, photos, and a written history and resource description. The HABS

documentation shall be submitted to the San Diego History Center, and to the SCIC at San Diego State University, which is the CHRIS Information Center for San Diego County.

Level of Significance After Mitigation

Implementation of mitigation measure HIST-1 would not reduce impacts related to historical resources (built environment) to a less than significant level. Impacts to historical resources (built environment) would remain **significant and unavoidable**.

3.4.4.2 Archaeological Resources

Threshold 2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact Discussion

The results of the records search, Native American contact program, and pedestrian field survey did not identify any archaeological resources within the project site. The entire project site is considered to have low archaeological sensitivity based on the results of the study, environmental factors (the heavily disturbed nature of the site), and the amount of modern development that has previously occurred for the entire airport. The Sacred Lands File search was positive for tribal cultural resources in the project vicinity, but no specific resources have been identified within the project area (refer to Section 3.14, *Tribal Cultural Resources*, for a detailed discussion of tribal cultural resource impacts). Implementation of the project would not cause a substantial adverse change in the significance of an archaeological resource, and **impacts would be less than significant**. No mitigation is required.

3.4.4.3 Human Remains

Threshold 3: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact Discussion

No cemeteries, formal or informal, have been identified or are known to be present on-site or within the project vicinity; however, it is possible for human remains to be discovered during certain construction activities, such as grading. In the event of such discovery, Health and Safety Code Section 7050.5 requires that no further disturbance occurs until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the MLD. The MLD may inspect the site of the discovery of the Native American remains and may recommend means for treating, with appropriate dignity, the human remains and any associated grave goods. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning the treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This would 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. 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. Compliance with existing regulatory requirements would ensure that impacts associated with human remains would be **less than significant.** No mitigation is required.

3.4.5 Cumulative Impact Analysis

The geographic scope of the cultural resources cumulative analysis is the southern California region, including both incorporated and unincorporated areas of San Diego County, surrounding counties, and Baja California due to the overlapping cultural histories in these areas.

3.4.5.1 Historical Resources (Built Environment)

Cumulative projects could involve the physical demolition, destruction, relocation, or alteration of eligible historical resources or their immediate surroundings. These projects would be subject to applicable federal, state, and local regulations; however, even with regulatory compliance, individual historical resources still could be affected or degraded as a result of new development or redevelopment associated with cumulative projects. Therefore, a significant cumulative impact could occur related to the loss of historic resources in the San Diego region. The proposed project would demolish an identified historic resource, and although mitigation measure HIST-1 would be applied, impacts would remain significant and unavoidable after mitigation. Therefore, the project's contribution to the significant cumulative historic resources impact **would be cumulatively considerable**.

3.4.5.2 Archaeological Resources

Cumulative projects could involve ground disturbing activities which have the potential to disturb archaeological resources. Cumulative projects would be required to comply with federal, state, and local laws and requirements (Secretary of the Interior Standards, Health and Safety Code Section 7050.5, CRHR, etc.) and mitigate any potential impacts to archaeological resources through monitoring or recovery programs. However, due to the widespread presence of archaeological resources in the region, it cannot be guaranteed that all projects would avoid significant impacts to cultural resources; therefore, a significant cumulative impact associated with cultural resources would occur. As discussed above, the entire project site is considered to have low archaeological sensitivity based on the results of the project-specific archaeological study, environmental factors (the heavily disturbed nature of the site), and the amount of modern development that has previously occurred for the entire airport; thus, the project's contribution to the significant cumulative archaeological resources impact **would not be cumulatively considerable**.

3.4.5.3 Human Remains

Human burials have occurred outside of formal cemeteries within San Diego County. Therefore, the potential exists for unknown burials to be present throughout the County where cumulative projects could require excavation at depths that could potentially expose or damage human remains. However, these projects would be required to comply with California Health and Safety Code Section 7050.5 and PRC Section 5097.98, which outline applicable protocols for the accidental discovery of human remains during construction activities, similar to the procedure outlined for the proposed project. With the adherence to state regulations, cumulative impacts to human remains would be **less than significant**.

3.5 Energy

This section addresses the potential energy impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to energy are also addressed.

3.5.1 Environmental Setting

3.5.1.1 Existing Energy Consumption and Generation

Units of Measure

The units of energy used in this section are the British thermal units (BTU), kilowatt hour (kWh), therms, and gallons. A BTU is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit (°F) at sea level. A kWh is a unit of electrical energy, and one kWh is equivalent to approximately 3,413 BTU, taking into account initial conversion losses (i.e., from one type of energy, such as chemical, to another type of energy, such as mechanical) and transmission losses. Natural gas consumption is described typically in terms of cubic feet or therms; one cubic foot of natural gas is equivalent to approximately 1,050 BTU, and one therm represents 100,000 BTU. One gallon of gasoline/diesel is equivalent to approximately 125,000/139,000 BTU, respectively, taking into account energy consumed in the refining process.

Electricity

State and Regional

According to the U.S. Energy Information Administration (EIA), California used approximately 245,717,145 megawatt hours (MWh) of electricity in 2024 (EIA 2025). Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building.

San Diego Gas & Electric (SDG&E) provides electric service to 3.7 million customers across a 4,100-square-mile service area that includes San Diego County (County) and southern Orange County (SDG&E 2026). SDG&E provides electricity to the project site and would continue to do so for the proposed project. According to SDG&E, its customers consumed approximately 4.4 billion kWh of electricity in 2025 (SDG&E 2025).

SDG&E receives electric power from a variety of sources. According to the California Public Utility Commission's (CPUC's) 2024 California Renewables Portfolio Standard Annual Report, 48 percent of SDG&E's power came from eligible renewable energy sources in 2023, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2024). Baseline electricity consumption is forecasted to grow at a rate of approximately 1.7 percent annually through 2040 in California (California Energy Commission [CEC] 2024a).

Natural Gas

State and Regional

According to the EIA, California used approximately 1,938,982 million cubic feet of natural gas in 2024 (EIA 2026). CPUC regulates natural gas utility service for approximately 10.8 million customers who receive natural gas from Pacific Gas & Electric (PG&E), Southern California Gas (SoCalGas), SDG&E, Southwest Gas, and several smaller natural gas utilities or independent storage operators (CPUC 2026a). SDG&E provides natural gas service to the counties of San Diego and Orange. SDG&E is a wholesale customer of SoCalGas and currently receives all of its natural gas from the SoCalGas system (CPUC 2026b).

The majority of natural gas used in California is sourced from out-of-state natural gas basins. The state does not receive liquefied natural gas supplies. Biogas, including gas from wastewater treatment plants and dairy farms, has recently begun to be used, and the state has been encouraging its development and expansion. Natural gas from out-of-state production basins is delivered to California via the interstate natural gas pipeline system. This gas is then delivered from SoCalGas and PG&E via the statewide network to local transmission and distribution pipelines, or local storage fields (CPUC 2026b).

Statewide natural gas demand is expected to decrease at an annual average rate of 1.1 percent through 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, and SB 350 goals to decrease the use of non-renewable energy sources such as natural gas. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 codes and standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (California Gas and Electric Utilities 2022).

Petroleum

State and Regional

According to the EIA, California used approximately 649 million barrels of petroleum in 2023, with the majority (555 million barrels) used for the transportation sector (EIA 2025b). This total annual consumption equates to a daily use of approximately 1.8 million barrels of petroleum. There are 42 U.S. gallons in a barrel; therefore, California consumes approximately 76 million gallons of petroleum per day and 26 billion gallons of petroleum annually.

Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel (diesel fuel and fuel oils), liquefied petroleum gases, and jet fuel. In 2024, it was estimated that retail gasoline sales in San Diego County totaled 1.1 billion gallons annually, which was the third highest amount consumed among counties in California behind Los Angeles County (3 billion gallons) and Orange County (1.15 billion gallons; CEC 2024b). The retail sales of diesel fuel in 2024 were estimated to be 113 million gallons in 2024 in San Diego County, which ranked as the sixth largest consumer out of counties in California behind Los Angeles, San Bernardino, Kern, Riverside, and San Joaquin counties (CEC 2024b) Petroleum currently accounts for the majority of California's transportation energy consumption. However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote

the development and use of alternative fuels, reduce transportation-source air pollutants and greenhouse gas (GHG) emissions, and reduce vehicle miles traveled (VMT).

3.5.2 Regulatory Framework

A summary of federal, state, and District regulations that pertain to energy is provided below. No regional or local regulations related to energy apply to the project.

This section focuses primarily on policies, regulations, and laws that directly pertain to the regulation of energy resources. Many regulations and programs that target the reduction of pollutant or GHG emissions are expected to achieve co-benefits to energy in the form of reduced demand for energy-related resources and enhanced efficiencies related to energy consumption. For example, programs that regulate fuel efficiency are relevant to both emissions and energy consumption. Refer to Section 3.2.2 and Section 3.7.2 for additional federal and state regulations related to energy.

3.5.2.1 Federal

At the federal level, the U.S. Department of Transportation (USDOT), the U.S. Department of Energy, and the U.S. Environmental Protection Agency (USEPA) are three agencies with significant influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through the establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major relevant federal energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

First enacted in 1975, the Federal Energy Policy and Conservation Act established fuel economy standards for on-road motor vehicles in the U.S. The National Highway Traffic and Safety Administration, which is part of USDOT, is responsible for establishing additional vehicle standards and revising the existing standards under the Energy Policy and Conservation Act. Current standards require a combined passenger car and light-duty truck average fuel economy of 49 miles per gallon by 2026 (National Highway Traffic and Safety Administration 2022). Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Fuel economy is determined based on each manufacturer's average fuel economy for their fleet of vehicles available for sale in the U.S. On the basis of information gathered under the program, USDOT is authorized to assess penalties for noncompliance. Over its nearly 40-year history, this regulatory program has resulted in vastly improved fuel economy throughout the U.S. vehicle fleet.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set increased fuel economy standards for motor vehicles as well as a renewable fuel standard, building energy efficiency standards, and appliance and lighting efficiency standards. The lighting efficiency standards required increasing levels of energy efficiency, ultimately requiring light bulbs by 2020 to consume 60 percent less energy and effectively phasing out the incandescent lightbulb.

Under the Energy Independence and Security Act, USEPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the U.S. contains a minimum volume

of renewable fuel. The renewable fuels program was expanded to include diesel fuel in addition to gasoline. The Energy Independence and Security Act also required the USEPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces. Additional provisions of the Energy Independence and Security Act address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 promoted the development of inter-modal transportation systems to maximize mobility, as well as to address national and local interests in air quality and energy. It contained factors that Metropolitan Planning Organizations (MPOs) were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution. The Transportation Equity Act for the 21st Century builds upon the initiatives established in the Intermodal Surface Transportation Efficiency Act legislation and authorizes continued and additional highway, highway safety, transit, and other efficient surface transportation programs.

3.5.2.2 State

Renewable Portfolio Standard

Senate Bill 1078

Senate Bill (SB) 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable energy generation by the utilities equivalent to at least one percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently revised as described below.

Senate Bill 1368

SB 1368 (September 2006) required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local, publicly owned utilities. These standards must be consistent with the standards adopted by the CPUC.

Executive Order S-14-08

Executive Order (EO) S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency (CNRA), through collaboration with the CEC and California Department of Fish and Wildlife (CDFW; formerly the California Department of Fish and Game), was directed to lead this effort.

Executive Order S-21-09 and Senate Bill X1-2

EO S-21-09 (September 2009) directed the California Air Resources Board (CARB) to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the CPUC and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs or impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1-2 expanded the RPS by establishing a renewable energy target for the total electricity sold to retail customers in California per year of 20 percent by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

Senate Bill 350

SB 350 (October 2015, Clean Energy and Pollution Reduction Act) further expanded the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year being from renewable sources by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. Regarding mobile sources, SB 350 establishes California Public Utilities Code Section 740.12, which involves a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for the achievement of the state's 2030 and 2050 GHG emission reduction targets.

Senate Bill 100

SB 100 (2018) increased the renewable energy standards set forth in SB 350, establishing that of the total electricity sold to retail customers in California per year, 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California by 2045. This bill also requires that the achievement of 100 percent zero-carbon electricity resources does not increase carbon emissions elsewhere in the western grid and that the achievement does not occur through resource shuffling.

Senate Bill 1020

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources:90 percent by December 31, 2035; 95 percent by December 31, 2040; and 100 percent by December 31, 2045.

California Energy Code

California Code of Regulations (CCR) Title 24, Part 6 regulations, California's Energy Efficiency Standards for Residential and Non-residential Buildings, were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions. The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The Building Energy Efficiency Standards focus on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. These include standards for on-site solar PV (solar panels) and battery storage systems, electric-ready requirements, indoor air quality requirements, and requirements for electric vehicle (EV) charging (CEC 2025).

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are basically a recipe or a checklist compliance approach.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) is a code with mandatory requirements for all non-residential buildings (including industrial buildings) and residential buildings for which no other state agency has the authority to adopt green building standards. CALGreen also contains voluntary measures (i.e., Tier 1, Tier 2) that exceed minimum regulatory requirements. As is the case for the California Energy Code, CALGreen is updated every three years.

The development of CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

CALGreen contains requirements for storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

Assembly Bill 1109

Enacted in 2007, Assembly Bill (AB) 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting in order to reduce electricity consumption by 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.

CEQA Guidelines Appendix F

CEQA Guidelines Appendix F, *Energy Conservation*, provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. In addition, though not described as thresholds for determining the significance of impacts, Appendix F seeks inclusion of information in an EIR addressing the following topics:

- The project's energy requirements and its energy-use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

3.5.2.3 District

Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and SDCCD Sustainability Levels.

Sustainability Plan

The District's sustainability framework includes goals in carbon reduction, energy efficiency, water conservation, climate resilience, materials management, indoor and outdoor environmental quality, health and wellness, and community engagement. The Sustainability Plan outlines tangible actions that align with long-term sustainability goals. The district also emphasizes education and outreach, community awareness events, and campus-wide sustainability initiatives. The Sustainability Plan incorporates the California Community Colleges Chancellor's Office's comprehensive Climate Action and Sustainability Framework, which includes goals in the following areas: Greenhouse Gas Emissions

Reduction; Green Buildings; Energy Efficiency; Water Conservation; Waste Reduction; Sustainable Purchasing and Procurement; Transportation; and Food Systems. Goals related to energy include the following:

Green Buildings

- 2025 Benchmark: Establish energy usage intensity (EUI) scores for each building.
- 2030 Goal: Reduce natural gas usage in buildings by 30%.
- 2035 Goal: Achieve a 75% reduction in natural gas usage.

Energy Efficiency

- 2025 Benchmark: Establish EUI scores.
- 2030 Goal: Decrease EUI by 25%.
- 2035 Goal: Decrease EUI by 40%.

Development of the District's Sustainability Plan also included workshops in which feedback provided by students, faculty, and staff was used to identify key themes to guide the development of the goals for the Sustainability Plan. These goals, which include an associated Key Performance Indicator (KPI) have been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects. The following are related to energy.

Energy Goal 1: Maximize the amount of on-site renewable energy generation. **KPI:** Solar Panels installed on every new building.

Energy Goal 2: Carbon Reduction. **KPI:** Build all electric facilities. No natural gas. **KPI:** Utilize all electric vehicles for SDCCD facilities use.

Energy Goal 3: Decrease Energy Consumption. **KPI:** Meter each building. **KPI:** Utilize cool roofs. **KPI:** Utilize natural daylight. i.e., skylights.

SDCCD Sustainability Levels

The District's Sustainability Levels are designed to recognize, measure, and promote sustainable practices across District campuses and facilities. They provide a tiered rating system that encourages environmentally responsible design, construction, and operations. All District capital projects, including new construction, major renovations, and modernization, are required to incorporate the principles outlined in the District Sustainability Levels and meet applicable local, state, and District-adopted sustainability policies. District-adopted sustainability standards include the following:

1. Each campus shall facilitate and maintain an ongoing waste recycling program that establishes where facilities on campus will handle recycled materials including paper, cardboard, glass, plastics, and metal.
2. Renewable woods shall be specified and detailed.
3. The designer shall specify the Carpet and Rug Institute's Green Label Plus Program. All carpet cushion installed in the building shall have low emitting materials and backing.
4. The District's Facilities Services have adopted a program of Green cleaning materials and techniques.

The District's Sustainability Levels include categories with specific requirements that each have an assigned point value. The categories include project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation. A scorecard is filled out based on the requirements the project achieves, which determines the sustainability level for the project from the following:

- Baseline/ Sagebrush (Baseline Sustainability) – Meets the District's minimum sustainability standards, with basic energy and water conservation measures.
- Certified/ Coast Live Oak (Sustainable Performance) – Demonstrates significant sustainable strategies.
- Silver/ Torrey Pine (High-Performance Green Building) – Meets advanced sustainable quality benchmarks.
- Gold/ Redwood (Leadership in Sustainability) – Implements innovative sustainability strategies.
- Platinum/ Sequoia (Exemplar of Sustainability) – Sets model for sustainable education facilities.

All final programming documents must contain a section related to sustainability. The conceptual design for new building projects must have sustainable features that achieve the Certified/Coastal Live Oak level at a minimum. Conceptual design schemes for major renovation projects should have sustainable features and may be required to achieve a Certified/Coastal Live Oak level; however, this is determined on a case-by-case basis based on the feasibility of incorporating such features into a renovation project.

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following specifications are related to energy.

Heating, Ventilation, and Air Conditioning

This section includes the following energy efficiency standards for HVAC systems installed on District properties. Specific requirements are included in the areas of system components for energy efficiency, fan and motor efficiency, optimized airflow and exhaust placement, thermostat placement considerations, control system integration, and economizer requirements.

Site Furnishings

This section directs projects implemented on District properties to provide solar-powered aluminum umbrellas equipped with integrated PV panels capable of charging mobile devices in outdoor environments. The system must support at least three dual USB charging ports for use with phones, tablets, and laptops. Umbrellas should be compatible with standard outdoor table configurations (e.g., carousel-style) and be available in a range of durable, weather-resistant finishes and color options.

Electric Power Generation

This section states that the District is committed to implementing clean, resilient, and code compliant energy systems in support of California's energy goals, District sustainability objectives, and long term operational efficiency. This section additionally establishes the minimum requirements for the design, installation, and integration of PV systems and battery energy storage systems on new construction and major modernization projects within the District. The District has committed to providing 1 megawatt of PV generation capacity at Mesa College, City College, and Miramar College.

District Board Policies

Board Policy 6970: Green Building Policy and Major Renovation Standards. The Board of Trustees has established a Green Building Policy and Major Renovation Standards to provide District students, faculty and staff with working and learning environments that are healthy, thermally, visually, and acoustically comfortable; energy efficient; material efficient; water efficient; easy to maintain and operate; safe and secure and sited in an environmentally responsible manner. In accordance with this Board Policy, the District selects architects, engineers and other professionals who have demonstrated expertise in sustainable design and are Leadership in Energy and Environmental Design (LEED) accredited as deemed appropriate.

Administrative Policy 6970: Green Buildings. The purpose of this procedure is to provide guidance for implementing District policies and standards for the design and construction of green buildings and renovations. Efficient energy use and efficiently designed buildings are central to resource sustainability efforts of the District, City, and state. Energy conservation in building design 1) reduces the operating costs of the District, 2) reduces the carbon footprint of the District, and 3) provides environmental education. This Administrative Procedure goes on to outline criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED-NC gold rating, and requiring that at least 5 percent of a project's total energy is generated on site from renewable sources.

3.5.3 Thresholds of Significance

Thresholds used to evaluate potential energy impacts are based on CEQA Guidelines Appendix G. A significant energy impact could occur if implementation of the proposed project would:

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.4 Impact Analysis

3.5.4.1 Energy Consumption

Threshold 1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Discussion

Electricity

During construction of the project, temporary electric power would be provided by SDG&E for as-necessary lighting and electronic equipment (including use for computers, HVAC within construction trailers), and electrically powered hand tools. The electricity used for construction activities would be temporary and minimal. It also would be used on an as-needed basis and, therefore, would not be wasteful, inefficient, or unnecessary.

Once operational, the project would utilize electricity for interior and exterior lighting, HVAC systems, computer and office equipment, EV charging stations, and additional hangar operations such as security systems and elevators. The project would be required to comply with all federal, state, and District policies related to energy conservation. The District currently implements green building standards in campus facilities in accordance with Board Policy 6970 (Green Building Policy and Major Renovation Standards) and Administrative Procedure 6970 (Green Buildings) as outlined in Section 3.5.2.3. Board Policy 6970 requires the District to select architects, engineers and other professionals who have demonstrated expertise in sustainable design and are accredited. Administrative Procedure 6970 provides guidance for implementing District policies and standards for the design and construction of green buildings and renovations and outlines criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent and requiring that at least five percent of a project's total energy is generated on site from renewable sources.

The District has additionally developed the Sustainability Levels, which provide a tiered rating system that encourages environmentally responsible design, construction, and operations. The Sustainability Levels framework identifies incentives for energy and carbon performance standards, including energy efficiency greater than Title 24 requirements, integration of on-site renewable energy sources and battery storage. The project would achieve the Certified/Coastal Live Oak level, which is defined as a building that implements significant sustainable strategies (see Section 3.5.2.3 for additional information regarding this program).

While the project would increase the overall demand for electricity on the project site, the replacement of the older and less efficient Miramar Hangar with an instructional space constructed in compliance with current, more stringent energy codes would make electricity use more efficient. With adherence to state building codes that regulate energy efficiency and implementation of the District policies related to energy conservation outlined above, the project would not result in the wasteful, inefficient, or unnecessary consumption of electricity during project construction or operation.

Natural Gas

The project is not anticipated to utilize natural gas and would instead be all electric. Therefore, implementation of the project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas during project construction or operation.

Petroleum

Petroleum-based fuels, including gasoline and diesel, would be the primary source of energy during construction. Fuel consumed by construction equipment would be the primary source of energy consumption during construction, while the transportation of construction materials and construction workers would also use fuel resources. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in moving dirt around the project site, are anticipated to rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of project construction. It is assumed that construction workers would travel to and from the project site mainly in gasoline-powered vehicles.

The project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to no more than five minutes. Furthermore, the construction practices used would be typical and would not require specialized construction equipment or otherwise present unusual circumstances in which substantial amounts of fuel would be required. In addition, given the high cost of fuel, contractors and the District have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of these resources during construction. Therefore, petroleum use during construction of the project would be temporary and would not be wasteful or inefficient.

The majority of fuel consumption during operation of the project would be used by vehicles traveling to and from the project site for student, faculty, and staff commutes. Although the amount of vehicle trips is expected to increase as a result of regional growth and the increase in Aviation Operation Program enrollment at Miramar College and could result in an increase in petroleum use, over the lifetime of the project, the fuel efficiency of the vehicles used by students, faculty, and staff is expected to increase. This is largely due to increasing statewide fuel economy standards and an anticipated shift in the statewide vehicle fleet to increased numbers of EVs. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California. The project would support the implementation of these efforts with the installation of EV charging infrastructure in the parking areas on the project site.

In addition, petroleum would be utilized to power the District fleet, which would serve the project site for District Police Department patrols and maintenance. However, the District is currently purchasing zero-emission vehicles for maintenance and facilities staff as the fleet requires replacement, which would reduce the amount of petroleum consumed by District vehicles over time compared to existing conditions. While the project would result in the consumption of petroleum-based fuels during operation, implementation of the project would not result in the wasteful, inefficient, or unnecessary consumption of petroleum-based energy resources.

The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. **Impacts would be less than significant**. No mitigation is required.

3.5.4.2 Energy Plans

Threshold 2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Discussion

The project would comply with applicable energy standards and regulations during construction and would be built and operated in accordance with applicable building regulations in effect at the time of construction. These regulations would include CALGreen, which contains requirements for construction waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation, and the California Energy Code, which includes standards including, but not limited to, electric-ready requirements, indoor air quality requirements, and requirements for EV charging.

The District has outlined various policies which implement the renewable energy and energy efficiency guidance within the Community Colleges Board of Governors' Climate Action and Sustainability Framework. At the District level, the project would be required to incorporate the principles outlined in the District Sustainability Levels. Within the categories of project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation, the Sustainability Levels framework outlines specific implementation methods which would be applied to these projects as feasible. Refer to Section 3.5.2.3 for additional information. The project would achieve a Certified/Coastal Live Oak level, which demonstrates significant sustainable strategies. To achieve this performance level, the project would be an all-electric development and include features such as utilization of recycled construction materials, high-efficiency low-flow plumbing fixtures, and water-conserving appliances. Due to the airport environment, no solar panels are proposed. In addition, District projects that involve parking facilities are required to install EV charging stations, and new buildings would be all-electric to the extent feasible. The project would include the installation of nine EV ready spaces and seven EV charging spaces.

As discussed further in Section 3.7, *Greenhouse Gas Emissions*, the project was evaluated for consistency with the City's Climate Action Plan (CAP; City 2022) and was determined to be consistent with the growth projections used in the development of the CAP and would be consistent with the CAP Consistency Regulations to the extent they are applicable to the project. As such, the project would not conflict with the City's CAP. Therefore, implementation of the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Impacts would be less than significant**. No mitigation is required.

3.5.5 Cumulative Impact Analysis

The geographic scope for projects that may have a potential cumulative impact related to energy are projects occurring within the areas served by the project's energy service provider (SDG&E).

3.5.5.1 Energy Consumption

Potential cumulative impacts related to energy consumption could result if the project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, not achieve building energy efficiency standards, or would result in the wasteful or unnecessary use of energy during construction or operations. Projects that would mostly include construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the cumulative impact of these projects would be limited because they would typically not involve ongoing, substantial energy use. Similar to the project, cumulative development projects would be subject to applicable state energy efficiency regulations, such as CALGreen and California Energy Code energy efficiency standards. Future development would be required to meet increasingly stringent building standards as they are set forth by the state. As discussed above, the project would not result in the wasteful or inefficient use of energy. Therefore, the cumulative impact related to the wasteful or inefficient use of energy from the proposed project, in combination with cumulative projects, would be **less than significant**.

3.5.5.2 Energy Plans

Cumulative development projects would be required to comply with increasingly stringent building standards set forth by the state, such as CALGreen and the California Energy Code, in addition to local energy efficiency requirements such as the City's CAP, where applicable. These regulations also direct the provision of renewable energy on new construction, typically in the form of solar PV systems. Similarly, the project would be required to comply with District policies and state requirements for increasing energy efficiency. Therefore, the cumulative impact from the proposed project, in combination with cumulative projects, would be **less than significant**.

3.6 Geology and Soils

This section addresses the potential geology and soils impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to geology and soils are also addressed. This section relies on the information and analysis in the Preliminary Geotechnical Investigation prepared by UES Professional Solutions, Inc. (2026) provided as Appendix F to the EIR.

3.6.1 Environmental Setting

3.6.1.1 Geologic Setting

The project site is situated in the San Diego County (County) coastal section of the Peninsular Ranges Geomorphic Province (Province). This Province encompasses an area that extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin on the north to the southern tip of Baja California on the south. The Province varies in width from approximately 30 to 100 miles. In general, the Province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the southern California batholith. In the coastal plain portion of the Province where the project site is located, Quaternary-age sedimentary deposits overlie Tertiary- and Cretaceous-age sedimentary units. The Province is traversed by a group of sub-parallel faults and fault zones trending roughly northwest. Several of these faults are considered active faults, including the Elsinore, San Jacinto, and San Andreas fault systems located northeast of the project site.

Geologic Units

The geologic units underlying the project site consist of Quaternary Very Old Paralic Deposits, Unit 8, (Qvop8), and Quaternary Previously Placed Fill (Qppf). Each of these geologic units are further described below.

Quaternary Previously Placed Fill

Quaternary Previously Placed Fill was observed near the ground surface of the project site in the exploratory borings at depths ranging from approximately 1.0 to 5.5 feet below ground surface. This material generally consists of very loose to dense, dry, brown to reddish brown, fine- to medium-grained, silty to clayey sand.

Quaternary Very Old Paralic Deposits, Unit 8

Quaternary Very Old Paralic Deposits, Unit 8 were observed beneath the Quaternary Previously Placed Fill, extending to the maximum exploration depth of approximately 20 feet below ground surface. The Quaternary Very Old Paralic Deposits, Unit 8 consist of dense to very dense, dry, grey to orangish brown, fine- to coarse-grained, silty to clayey sand, or clay.

Groundwater

Groundwater was not encountered to the maximum explored depth of approximately 20 feet below ground surface during the subsurface investigation on the project site. Groundwater conditions may vary with seasonal precipitation, irrigation, and other site-specific factors. According to the Preliminary Geotechnical Investigation, seepage or perched groundwater may be encountered during grading or

excavation activity during project construction, especially following periods of sustained precipitation or irrigation.

3.6.1.2 Geologic Hazards

Faulting and Seismicity

The project site is located in a seismically active area, as is the majority of southern California, resulting in the potential for strong ground motion at the project site. The Quaternary Fault and Fold Database developed by the U.S. Geologic Survey (USGS) identified and categorizes faults into four Classes (Class A-D). Class A faults are considered to have the highest potential to generate earthquakes and/or surface rupture, and the earthquakes and surface rupture potential generally increases from oldest to youngest. The nearest known Class A fault is the Murphy Canyon Fault (Undifferentiated Quaternary), which is located approximately two miles east of the project site. According to the PEIR prepared for the Montgomery-Gibbs Executive Airport (MYF) Airport Master Plan, this fault is not considered active or potentially active, and evidence for the fault is poorly documented and appears mostly based on linear character of Murphy Canyon and a reported 30-foot vertical offset of the contact between the very old paralic deposits on either side of the canyon. The nearest active fault capable of causing ground rupture and strong earthquake shaking is the Rose Canyon fault zone located approximately four miles southwest of MYF (City 2025). Further, no known active or potentially active fault traces are mapped crossing the project site and the project site is not located within an Alquist-Priolo Earthquake Fault Zone. As such, the potential for surface fault rupture at the project site is considered low.

The City of San Diego Seismic Safety Study (City 2008) Geologic Hazards and Faults maps document the known and suspected geologic hazards and faults in the region. The maps rate potential hazards by relative risk, on a scale from nominal to high. The Seismic Safety Study is intended as a tool to determine the level of geotechnical review to be required by the City for planning, development, or building permits. The project site is located within geologic hazard category 51 (Level mesas-underlain by terrace deposits and bedrock, nominal risk).

Landslides

Areas having the potential for earthquake-induced landslides generally occur within areas of previous landslide movement, or where local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement. Debris flows are caused by high rainfall, steep slopes, loss of vegetation cover, and thick overburden. No landslides have been mapped at the relatively flat project site, and evidence of landsliding or slope instability was not observed during field explorations or site reconnaissance.

Liquefaction and Seismically Induced Settlement

Liquefaction is the phenomenon in which ground shaking of sufficient duration results in the loss of grain-to-grain contact due to rapid rise in pore water pressure, and it eventually causes the soil to behave as a fluid for a short period of time. Factors known to influence liquefaction potential include composition and thickness of soil layers, grain size, relative density, groundwater level, degree of saturation, and both intensity and duration of ground shaking. Liquefaction typically occurs when loosely deposited, saturated granular soils located below the water table with clay contents of less than 15 percent, liquid limit of less than 35 percent, and natural moisture content greater than 90 percent of the liquid limit undergo rapid loss of shear strength due to development of excess pore pressure during

strong earthquake-induced ground shaking. Liquefaction is known to generally occur in saturated or near-saturated cohesionless soils at depths shallower than 50 feet below grade.

As discussed in Section 3.6.1.1, the project site is underlain by dense to very dense Very Old Paralic Deposits, and groundwater was not encountered to a maximum explored depth of approximately 20 feet below ground surface. Based on these subsurface conditions, the potential for liquefaction and significant seismic settlement at the site is considered low.

Soil Expansion

Soil expansion generally results from specific clay minerals that have the capacity to shrink or swell in response to changes in moisture content. Shrinking or swelling of foundation soils can lead to damage to slabs, foundations, and other engineered structures, including tilting and cracking. The expansion potential of a soil is determined through laboratory testing to determine if the expansion index of a soil is very low to very high. The earth materials present within the project site are generally anticipated to exhibit low expansion potential.

3.6.1.3 Paleontological Resources

Paleontological resources (fossils) are the remains of indications of ancient non-human organisms and, as such, are scarce non-renewable natural resources. Fossil remains such as bones, teeth, shells, and leaves are found in geologic deposits (rock formations) where they were originally buried. As a result, the potential for fossils in an area can be predicted based on known relationships between geologic formations and fossil occurrences. Although typically it is assumed that fossils must be older than approximately 11,700 years, organic remains older than recorded human history and/or older than middle Holocene (about 5,000 radiocarbon years) can also be considered to represent fossils.

As discussed in Section 3.6.1.1, the project site is primarily underlain by Quaternary Very Old Paralic Deposits, Unit 8, and Quaternary Previously Placed Fill. According to the City of San Diego CEQA Significance Determination Thresholds (City 2022), the Very Old Paralic Deposits, Unit 8, that underly the project site have a moderate paleontological sensitivity rating, while the previously placed artificial fill is assigned no paleontological resource sensitivity.

3.6.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to geology and soils is provided below.

3.6.2.1 Federal

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) established the National Earthquake Hazards Reduction Program, which is coordinated through the Federal Emergency Management Agency (FEMA), the USGS, the National Science Foundation, and the National Institute of Standards and Technology. The purpose of this program is to establish measures for earthquake hazards reduction and promote the adoption of earthquake hazards reduction measures by federal, state, and local governments; national standards and model code organizations; architects and engineers; building owners; and others with a role in planning and constructing buildings, structures, and lifelines through

(1) grants, contracts, cooperative agreements, and technical assistance; (2) development of standards, guidelines, and voluntary consensus codes for earthquake hazards reduction for buildings, structures, and lifelines; and (3) development and maintenance of a repository of information, including technical data, on seismic risk and hazards reduction. The National Earthquake Hazards Reduction Program is intended to improve the understanding of earthquakes and their effects on communities, buildings, structures, and lifelines through interdisciplinary research that involves engineering, natural sciences, and social, economic, and decisions sciences.

Disaster Mitigation Act of 2000

The Federal Disaster Mitigation Act of 2000 (Public Law 106-390) provides the legal basis for FEMA mitigation planning requirements for state, local, and tribal governments as a condition of mitigation grant assistance. This act amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasizes the need for state, local, and tribal entities to closely coordinate mitigation planning and implementation efforts. The requirement for a state mitigation plan is continued as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two levels of state plans. This act also established a new requirement for local mitigation plans and authorized up to seven percent of Hazard Mitigation Grand Program funds available to a state for the development of state, local, and tribal mitigation plans.

International Building Code

The International Building Code (IBC) is one of the International Codes published by the International Code Council and forms the basis for the California Building Code (CBC), as well as most of the state building codes in the U.S. The IBC assigns buildings risk categories and design requirements based on the intended use of a facility. The IBC has been adopted by the California Legislature to address the specific building conditions and structural requirements for California, as well as provide guidance on foundation design and structural engineering practices for different soil types.

U.S. Geological Survey Landslide Hazards Program

The USGS Landslide Hazard Program provides information on landslide hazards, including information on current landslides, landslide reporting, real time monitoring of landslide areas, mapping of landslides through the National Landslide Hazards Map, local landslide information, landslide education, and research (USGS 2024).

3.6.2.2 State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] Sections 2621-2630, Division 2 Chapter 7.5) was passed in 1972 to mitigate the hazard of surface faulting to structures intended for human occupancy. The purpose of this act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The act requires the State Geologist to establish regulatory zones, known as “Earthquake Fault Zones,” around the surface traces of active faults and to issue appropriate maps. Local agencies must

regulate most development projects within these zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings for human occupancy would not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50-foot setbacks are required).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 directs the California Department of Conservation (DOC), California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the Seismic Hazards Mapping Act is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. Staff geologists gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally to evaluate the severity of seismic hazards and designate Zones of Required Investigation for those areas prone to liquefaction and earthquake-induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. The Seismic Hazards Mapping Act requires that site-specific geotechnical investigations be conducted within the Zones of Required Investigation to identify and evaluate seismic hazards (i.e., liquefaction and earthquake-induced landslides) and formulate mitigation or recommendations to reduce these hazards prior to permitting most developments designed for human occupancy.

Special Publication 117A

The CGS prepared the Guidelines for Evaluating and Mitigating Seismic Hazards in California (Special Publication 117A) in 2008, revising the 1997 edition of this publication. Special Publication 117A constitutes the guidelines for evaluating seismic hazards other than surface fault-rupture, and for recommending mitigation measures as required by PRC Section 2695(a). The objectives of Special Publication 117A are to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act.

California Geologic Survey Note 48 Requirements

CGS Note 48 is a checklist used by CGS to evaluate engineering geology and seismology reports prepared for public schools, hospitals, skilled nursing facilities, and essential services buildings under the CBC. It outlines the required components of these reports, including assessments of faulting, landslides, liquefaction, and other geologic hazards, and ensures they meet regulatory standards prior to approval by agencies such as the Division of the State Architect (DSA) for schools.

California Building Standards Code

California building standards are published in California Code of Regulations (CCR) Title 24, also known as the California Building Standards Code. The California Building Standards Code, which applies to all applications for building permits, consists of 11 parts that contain administrative regulations for the California Building Standards Commission and for all state agencies that implement or enforce building standards. Local agencies must ensure development complies with the California Building Standards

Code guidelines. Cities and counties can also adopt additional building standards that are more stringent than the California Building Standards Code. California Building Standards Code Part 2, the CBC, is based upon the IBC, as described below.

California Building Code

The CBC, Part 2 of the California Building Standards Code, is included in CCR Title 24. The CBC incorporates the IBC, a model building code adopted across the U.S. Through the CBC, the state provides a minimum standard for building design and construction. The CBC contains specific requirements for seismic safety, foundations, retaining walls, and site demolition. The CBC also includes provisions for grading, including drainage and erosion control. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with a specified probability of occurring at a site.

Chapter 16, Structural Design, of the CBC requires that structural designs be based on geologic information for seismic parameters, soil characteristics, and site geology. Chapter 18, Soils and Foundations, defines the criteria for preparation of a geotechnical report. It also sets requirements for excavations and fills, foundations, and retaining structures with regard to expansive soils; design measures to address liquefaction potential, if warranted; subgrade bearing capacity; seismic design parameters; and waterproofing and dampproofing foundations. Chapter 33 of the CBC contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials.

3.6.2.3 Regional

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The 2023 San Diego County Multi-Jurisdictional Hazard Mitigation Plan was prepared to comply with the Disaster Mitigation Act of 2000 and increase disaster planning funding for the region. It is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdiction coordination. The Multi-Jurisdictional Hazard Mitigation Plan identifies coastal storms/erosion/tsunamis, dam failure, earthquakes, and landslides among the top hazards in the County due to the potential loss of life, injuries, and damage to property, as well as the potential for associated disruptions of public services.

3.6.2.4 District

District Design Guidelines and Standards Manual

Design Guides and Standards

Section 2.1, *Design Guides and Standards*, of the District Design Guidelines and Standards Manual outlines general procedures and standards for new construction and building modifications on District campuses.

Building Programming Standards

The Building Related Programming section states that building additions on District properties require that the existing portion of the building be surveyed to determine compliance (or noncompliance) with Americans with Disabilities Act (ADA), CBC (seismic related design) and the absence or presence of toxic substances (asbestos, lead-based paint, others).

Stormwater Management

The Stormwater Management section of the Design Guides and Standards includes requirements for compliance with SWRCB permits. Specifically, this section requires projects that would disturb less than one acre to prepare a Water Pollution Control Plan to manage sediment, materials, waste, and other pollutants in stormwater. Further, this section states that projects which would disturb more than one acre are subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit for stormwater discharges associated with construction and land disturbance activities (Order WQ 2022-0057-DWQ NPDES No. CAS000002). A Stormwater Pollution Prevention Plan (SWPPP) identifying site-specific best management practices (BMPs) must be developed to meet Construction General Permit requirements based on the project's risk level.

General Specifications

Section 2.2, *General Specifications*, of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications related to geology and soils are anticipated to apply to the project.

Geotechnical Requirements

The Geotechnical Requirements section of the General Specifications states that a project-specific geotechnical and seismic report is required for all new construction and must undergo DOC review as part of the DSA approval process and adhere to CGS Note 48 requirements, which are described further under Section 3.6.2.2 above. Specific requirements for the geotechnical and seismic report are outlined in this section of the General Specifications for areas such as earthwork specifications and documentation, stormwater infiltration, subsurface conditions, foundations and structural support, expansive soils and corrosive materials, slab and pavement support, geologic and fault evaluation, seismic response and hazard mitigation, and overall documentation.

Earthwork Requirements

The Earthwork Requirements section of the General Specifications states that earthwork and grading design shall follow the recommendations provided in the project-specific geotechnical report, which serves as the basis for all site preparation, excavation, fill, and slope stability strategies. The geotechnical report shall guide the design team in determining suitable excavation methods, compaction requirements, allowable bearing pressures, and subgrade preparation for both structural and non-structural areas. All grading activities shall account for site-specific soil conditions and be coordinated with the geotechnical engineer of record. The Earthwork Requirements also include specifications for cut and fill operations, reuse of native soils, slopes, grading, and drainage design.

3.6.2.5 Local

City of San Diego Seismic Safety Study

The City's Seismic Safety Study Geologic Hazards and Faults maps document the known and suspected geologic hazards and faults in the City. The maps show potential hazards and rates them by relative risk, on a scale from nominal to high. The Seismic Safety Study is intended to serve as a tool to determine the level of geotechnical review to be required by the City for planning, development, or building permits. While the District is not required to follow the City's guidance for further site-specific geotechnical investigations, these generalized maps provide guidance on geologic hazards within the project site.

City of San Diego Land Development Code

The City's Land Development Code sets forth the regulations that apply to the development of land in the City, and comprises Chapters 11, 12, 13, 14, and 15 of the San Diego Municipal Code. Per San Diego Municipal Code Section 129.0602, grading permits are required for any grading within open space easements or City-owned open space; any grading required for the restoration of unauthorized grading; any grading within the Special Flood Hazard Area; any grading in accordance with a Grading Permit required as a condition of a development permit to assure compliance with the development permit conditions; and other specific grading activities based on factors such as slopes, total graded area, or proposed fill content.

San Diego Municipal Code Paleontological Regulations

San Diego Municipal Code Section 142.0151 establishes the following paleontological resources requirements for grading activities:

a) Paleontological resources monitoring shall be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

    (1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or

    (2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or

    (3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding Land Development Code Section 142.0151(a), all grading in the area of discovery is required to cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the City's General Grading Guidelines for Paleontological Resources.

3.6.3 Thresholds of Significance

Thresholds used to evaluate potential geology and soils impacts are based on CEQA Guidelines Appendix G. A significant geology and soils impact could occur if implementation of the proposed project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

    a. 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;

    b. Strong seismic ground shaking;

    c. Seismic-related ground failure, including liquefaction; or

    d. Landslides;

2. Result in substantial soil erosion or the loss of topsoil;

3. 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;

4. 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;

5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or

6. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

To determine the potential for the project to result in impacts to paleontological resources, the District considered the City's adopted paleontological significance thresholds (City 2022) and San Diego Municipal Code Section 142.0151 as appropriate guidance to the evaluation of paleontological resource impacts. Based on the City's guidelines, potential impacts to paleontological resources would be considered significant if the project would:

- Require over 1,000 cubic yards of excavation, and 10 feet or greater in depth, in a high resource potential geologic deposit/formation/rock unit;

- Require over 2,000 cubic yards of excavation, and 10 feet or greater in depth, in a moderate resource potential geologic deposit/formation/rock unit; or

- Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

3.6.4 Impact Analysis

3.6.4.1 Seismic Hazards

Threshold 1: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

Impact Discussion

Ground Rupture

There are no known active or potentially active fault traces mapped crossing the project site and the project site is not located within an Alquist-Priolo Earthquake Fault Zone. As such, the Preliminary Geotechnical Investigation determined that the potential for surface fault rupture at the project site is considered low. The nearest active fault capable of causing ground rupture and strong earthquake shaking is the Rose Canyon Fault Zone located approximately four miles southwest of the project site. As described further below, conformance to building construction standards for seismic safety within the CBC and the project-specific seismic design criteria contained in the Preliminary Geotechnical Investigation would ensure that proposed structures would be able to withstand seismic events associated with these faults. Therefore, the project would not cause substantial adverse effects from rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map.

Ground Shaking

As discussed in Section 3.6.1.2, the Rose Canyon Fault Zone, the nearest active fault system, has been mapped approximately four miles southwest of the project site. This fault zone is capable of producing a maximum moment magnitude of 6.9 and the project site has the potential for strong ground motion due to earthquakes on nearby active faults. The Preliminary Geotechnical Investigation included a seismic evaluation at the project site to inform the project-specific seismic ground motion values in accordance with the American Society of Civil Engineers 7-22 Standard incorporated in the 2025 CBC. These values would be incorporated into the design of the project to resist the effects of earthquake ground motion. Adherence to applicable CBC standards and incorporation of the project-specific seismic design criteria contained in the Preliminary Geotechnical Investigation would ensure that the project would not cause substantial adverse effects, including the risk of loss, injury, or death, associated with ground shaking.

Ground Failure and Liquefaction

As discussed in Section 3.6.2.1, the project site is underlain by dense to very dense Very Old Paralic Deposits, and groundwater was not encountered to a maximum explored depth of approximately 20 feet below ground surface. Therefore, the potential for liquefaction and significant seismic settlement at the site is considered low. Regardless, the project would be required to comply with building construction standards in the CBC that would ensure the project would be able to withstand seismic activity in the region. No design recommendations specifically related to liquefaction were identified as necessary within the Preliminary Geotechnical Investigation prepared for the project. The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving ground failure or liquefaction.

Landslides

As discussed further in Section 3.6.1.2 above, landslides have not been mapped or observed on the project site, and the project site is relatively flat. Therefore, the potential for adverse effects from existing landslides is considered low, and no design recommendations related to landsliding are required to be incorporated into the project design. The project would not cause substantial adverse effects associated with landslides.

Given adherence to applicable building codes and incorporation of the project specific recommendations in the Preliminary Geotechnical Investigation, the project would not result in substantial adverse effects related to ground rupture, ground shaking, ground failure, or landslides. **Impacts would be less than significant**. No mitigation is required.

3.6.4.2 Soil Erosion

Threshold 2: Would the project result in substantial soil erosion or the loss of topsoil?

Impact Discussion

Grading, excavation, demolition, and construction activities associated with the project could expose topsoil, thereby increasing the potential for erosion. According to the Preliminary Geotechnical Investigation, excavations within the Quaternary Very Old Paralic Deposits and Quaternary Previously Placed Fill could encounter zones that are susceptible to erosion. Graded or excavated areas would be stabilized through the installation of hardscape once construction is complete; therefore, erosion potential would primarily be a concern during construction activities.

Earth-disturbing activities associated with construction would be temporary and the potential for erosion effects would depend largely on the areas disturbed, the quantity of disturbance, and the length of time soils are subject to conditions resulting in erosion. As discussed further in Section 3.9, *Hydrology and Water Quality*, the project would disturb more than one acre and would be required to prepare and submit a Notice of Intent and a SWPPP to the RWQCB demonstrating compliance with the NPDES Construction General Permit. Short-term erosion and sedimentation potential associated with construction activities would be addressed through conformance with the NPDES, which would include the development of an erosion and sedimentation control plan based on the project site characteristics and would identify BMPs to avoid erosion during construction. The final BMPs required during construction would be determined during preparation of the project-specific SWPPP but would include standard measures such as dust control, waste management, and silt fencing installation. Further, the project would be required to comply with the Preliminary Geotechnical Investigation and the Design Guidelines and Standards Manual which includes earthwork and grading design recommendations to reduce the potential for erosion. As such, the project would not result in substantial erosion or the loss of topsoil. **Impacts would be less than significant**. No mitigation is required.

3.6.4.3 Geologic Instability

Threshold 3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact Discussion

Based on the subsurface conditions of the project site, which primarily include dense to very dense Quaternary Very Old Paralic Deposits and no evidence of groundwater to a depth of 20 feet below ground surface, the potential for liquefaction and significant seismic settlement at the site is considered low. Soils with high densities are not considered to be at risk of lateral spreading, subsidence, liquefaction, or collapse due to the low potential for compaction or absorption. In addition, as discussed in Section 3.6.4.1, risks associated with landslides are considered to be low at the site. The project does not propose the creation of slopes or other features that would result in the project site becoming geologically unstable. Additionally, the project would be required to comply with the CBC, which contains design requirements by soil type to ensure building stability (Section 1806, *Presumptive Load-Bearing Values of Soils* and Section 1605*, Load Combinations*). The project would be constructed in accordance with the applicable geotechnical design recommendations and CBC requirements for fill material characteristics and allowable foundation bearing pressures based on the underlying soil types to accommodate the proposed buildings. The project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of being located on an unstable geologic unit. **Impacts would be less than significant**, and no mitigation is required.

3.6.4.4 Expansive Soil

Threshold 4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact Discussion

The project site is primarily underlain by Quaternary Very Old Paralic Deposits and Quaternary Previously Placed Fill that are generally anticipated to exhibit low expansion potential. The project would be required to implement the project-specific recommendations within the Preliminary Geotechnical Investigation, including that soil material used and compacted beneath the proposed building foundation to have a very low to no expansion potential. Further, the project would be required to comply with the CBC which specifies building requirements based on the expansion potential of underlying soils. Therefore, the project would not be located on expansive soil and would not result in a risk to life or property as a result of potential soil expansion. **Impacts would be less than significant**, and no mitigation is required.

3.6.4.5 Septic Tanks

Threshold 5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact Discussion

The project would rely on the existing sanitary sewer system within and in the vicinity of the projects site and would not use septic tanks or alternative wastewater disposal systems. Therefore, the project would not require soils capable of supporting the use of septic tanks or alternative wastewater disposal systems. **No impact would occur**, and no mitigation is required.

3.6.4.6 Paleontological Resources

Threshold 6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Discussion

The project site is primarily underlain by Quaternary Very Old Paralic Deposits, Unit 8, and Quaternary Previously Placed Fill. As discussed in Section 3.6.1.3, the Very Old Paralic Deposits, Unit 8, that underly the project site have a moderate paleontological sensitivity rating, while the previously placed artificial fill is assigned no paleontological resource sensitivity. According to the City's 2022 CEQA Significance Determination Thresholds, impacts to paleontological resources would be potentially significant if the project requires over 2,000 cubic yards of excavation within the Very Old Paralic Deposits, Unit 8, on the project site. As the project would require approximately 5,600 cubic yards of excavation on the project site, the project has the potential to directly or indirectly destroy unique paleontological resources. **Impacts would be potentially significant prior to mitigation**.

Mitigation Measures

GEO-1 Monitoring. Prior to the commencement of construction, a qualified Project Paleontologist shall be retained by the District or its Designated Representative(s) to oversee the mitigation program (a Project Paleontologist is a person with a Ph.D. or Master's Degree in Paleontology or related field, and who has knowledge of San Diego County paleontology and documented experience in professional paleontological procedures and techniques). In addition, a regional fossil repository shall be designated to receive discovered fossils (because the project is in the County of San Diego, the recommended repository is the San Diego Natural History Museum). The Project Paleontologist shall review available geotechnical data and project construction plans prior to the start of monitoring to determine precisely where and at what depths paleontological monitoring should occur.

The Project Paleontologist or a designated representative shall attend the project pre-construction meeting to consult with the grading and excavation contractors and environmental and engineering staff concerning excavation schedules, paleontological monitoring requirements and field techniques, and safety issues.

A paleontological monitor (working under the direction of the Project Paleontologist) shall be on-site on a full-time basis during all earthwork impacting previously undisturbed deposits of the Very Old Paralic Deposits, Unit 8, to inspect exposures for unearthed fossils. Monitoring should include testing for the presence of microfossils, which can be accomplished by collecting and screenwashing test samples of potentially fossil-bearing sediment, as deemed appropriate by the Project Paleontologist. Monitoring may be reduced or terminated at the discretion of the Project Paleontologist based on the results of initial monitoring.

If no fossils are discovered during monitoring, an abbreviated summary report shall be prepared at the completion of monitoring and submitted to the District to signal completion of the mitigation program.

GEO-2 Treatment of Fossil Discoveries. If fossils are discovered, the Project Paleontologist (or paleontological monitor) shall evaluate their significance, document, and recover them. In most cases, fossil recovery can be completed in a short period of time. However, some fossil specimens (e.g., a partial or complete large mammal skeleton) may require an extended salvage period. In these instances, the Project Paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt earthwork within 50 feet of the discovery site to allow recovery of fossil remains in a timely manner.

Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, identified, and catalogued as part of the mitigation program. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in the designated fossil repository. Fossils shall be deposited in the designated fossil repository within 90 days of completion of monitoring unless the Project Paleontologist determines that more time is required to prepare, stabilize, and/or curate the recovered fossils and communicates this revised timeline to the District and the designated fossil repository. Donation of the fossils shall be accompanied by financial support for initial specimen storage, provided by the District or its Designated Representative(s).

If fossils were discovered and salvaged during monitoring, an expanded summary report shall be prepared in place of the abbreviated summary report required under GEO-1. The report shall detail the results of the mitigation program, and shall include discussions of the methods used, stratigraphic section(s) exposed, recovered fossils and their significance, and an inventory list of catalogued fossils. The summary report shall be submitted to the designated fossil repository and to the District to signal completion of the mitigation program.

GEO-3 Inadvertent Fossil Discoveries. If fossils are discovered during construction when a paleontological monitor is not on site (i.e., during earthwork that was not anticipated to encounter paleontological resources), a 50-foot buffer shall be established around the discovery site and work shall cease in this area. The construction contractor shall contact the District and the District shall contact a qualified Project Paleontologist to evaluate the discovery and its significance. The Project Paleontologist shall recommend whether further mitigation (i.e., monitoring of remaining earthwork and treatment of the fossil discovery, as outlined in GEO-1 and GEO-2) is required. The Project Paleontologist shall document their recommendation in a memo submitted to the District, after which work may resume in the location of the discovery.

Level of Significance After Mitigation

Implementation of mitigation measures GEO-1 through GEO-3 would reduce impacts related to the destruction of unique paleontological resources to a level that is **less than significant**.

3.6.5 Cumulative Impact Analysis

Impacts related to geology and soils are generally site-specific, as risks associated with geologic settings in one location do not result in associated geologic failure elsewhere. Therefore, the geographic area for the analysis of cumulative impacts related to geology and soils consists of properties adjacent to the project site, except for impacts related to erosion and paleontological resources. The geographic area for the cumulative impact analysis related to erosion would be the hydrologic area (HA) for the project site (Lower San Diego HA), while the geographic area for cumulative impacts related to the regional loss of paleontological resources would be the City.

3.6.5.1 Seismic Hazards

Cumulative development projects would be sited within an area subject to seismic activity similar to the project site. Some of the cumulative projects would locate structures where there is potential for adverse effects including risk of loss, injury, or death due to rupture of a known earthquake fault, strong seismic ground shaking, liquefaction, or landslides. However, projects that could be exposed to these geologic hazards would be required to prepare project-specific geotechnical and/or soil investigations, and potential hazards would be avoided through incorporation of site-specific recommendations for design and construction. Similar to the project, cumulative development projects would be required to comply with applicable San Diego Municipal Code requirements, in addition to CBC regulations. Compliance with site-specific recommendations and state and local regulations would avoid the potential for cumulative impacts concerning seismic hazards. As the project would also incorporate these geotechnical requirements and recommendations, cumulative impacts would be **less than significant**.

3.6.5.2 Soil Erosion

Similar to the proposed project, cumulative development projects could also involve construction activities that result in temporary soil erosion or loss of topsoil. However, like the project, cumulative projects which would disturb more than one acre would be required to prepare and submit a Notice of Intent and a SWPPP to the RWQCB demonstrating compliance with the NPDES Construction General Permit and implement BMPs outlined in the associated erosion and sedimentation control plan. For projects under one acre in the City, a Water Pollution Control Plan with site-specific construction stormwater BMPs would be prepared and submitted to the City for approval. Once operational, graded or excavated areas would be stabilized through the installation of hardscape and landscaping. As such, cumulative impacts related to soil erosion would be **less than significant**.

3.6.5.3 Geologic Instability

Similar to the project, cumulative development projects would be required to adhere to applicable recommendations in project-specific geotechnical evaluations related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse risks as a result of being located on located on a geologic unit or soil that is unstable. Cumulative development could be sited within an area subject to geologic instability, but with implementation of applicable design recommendations to ensure no substantial

impacts related to geologic instability occur, their impacts would be less than significant similar to the project. As such, cumulative impacts would be **less than significant**.

3.6.5.4 Expansive Soil

Cumulative development projects would be required to comply with the CBC, CGS, and local requirements for expansive soils, similar to the project, and would therefore not create substantial direct or indirect risks to life or property as a result of expansive soils. Therefore, cumulative impacts related to expansive soil would be **less than significant**.

3.6.5.5 Septic Tanks

Similar to the project, cumulative projects are anticipated to rely on the existing sanitary sewer system that serves the campus and surrounding development and would not use septic tanks or alternative wastewater disposal systems. Should the cumulative projects require the use of septic tanks or alternative wastewater disposal systems, an analysis of on-site soils would be required to ensure that the specific site can adequately support these systems. As such, implementation of the project in combination with cumulative development would not result in significant cumulative impacts related to septic tanks or alternative wastewater systems and cumulative impacts would be **less than significant**.

3.6.5.6 Paleontological Resources

As discussed in Section 3.6.4.6, the project site is underlain by a geologic unit with moderate paleontological sensitivity, and projects proposed in these areas would be required to follow the mitigation framework outlined in mitigation measures GEO-1 through GEO-3. Some cumulative projects could also require excavation at depths and within geologic units that could potentially expose or damage paleontological resources. However, these projects would be required to comply with San Diego Municipal Code Section 142.0151 (Paleontological Regulations), which addresses potential impacts to paleontological resources through construction monitoring programs and treatment and/or curation requirements for discovered fossils similar to the mitigation framework outlined for the project. With the implementation of such mitigation measures and adherence to City regulations, cumulative impacts to paleontological resources from the identified cumulative projects would be considered **less than significant**.

3.7 Greenhouse Gas Emissions

This section addresses the potential greenhouse gas (GHG) emissions impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to GHG emissions are also addressed. This section relies on the information and analysis in the Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2026), provided as Appendix B to the EIR.

3.7.1 Environmental Setting

3.7.1.1 Climate Change Overview

Global climate change refers to changes in average climatic conditions on Earth, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function similar to a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The National Aeronautics and Space Administration (NASA) temperature records show a decades-long trend of warming, indicating that 2024 was the warmest year on record since 1880, with global temperatures approximately 2.3 degrees Fahrenheit (°F; or about 1.28 degrees Celsius) warmer than the 20th century baseline (1951 through 1980) and 2.65°F (1.47 degrees Celsius) warmer than the late 19th century (1850 through 1900) preindustrial average (NASA 2025). The 10 most recent years (2014 through 2024) have been the warmest on record (NASA 2025). GHG emissions from human activities are the most significant driver of observed climate change since the mid-20th century (United Nations Intergovernmental Panel on Climate Change [IPCC] 2013). The IPCC constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The statistical models show a "high confidence" that the global temperature increase caused by anthropogenic GHG emissions could be kept to less than two degrees Celsius relative to pre-industrial levels if atmospheric concentrations are stabilized at about 450 parts per million (ppm) carbon dioxide equivalent (CO_2e) by the year 2100 (IPCC 2014).

3.7.1.2 Greenhouse Gases of Primary Concern

The GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Although water vapor is the most abundant and variable GHG in the atmosphere, it is not considered a pollutant; it maintains a climate necessary for life.

Carbon Dioxide. CO_2 is the most important and common anthropogenic GHG. CO_2 is an odorless, colorless GHG. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungi; evaporation from oceans; and volcanic outgassing. Anthropogenic sources of CO_2 include burning fuels, such as coal, oil, natural gas, and wood. Data from ice cores indicate that CO_2 concentrations remained steady prior to the current period of anthropogenic influences for approximately 10,000 years. The atmospheric CO_2 concentration in 2010 was 390 ppm,

39 percent above the concentration at the start of the Industrial Revolution (about 280 ppm in 1750). As of May 2026, the CO_2 concentration exceeded 432 ppm, an approximately 54 percent increase since 1750 (National Oceanic and Atmospheric Administration [NOAA] 2026).

Methane. CH_4 is a gas and is the main component of natural gas used in homes. A natural source of CH_4 is the decay of organic matter. Geological deposits known as natural gas fields contain CH_4, which is extracted for fuel. Other sources are from the decay of organic material in landfills, fermentation of manure, and cattle digestion.

Nitrous Oxide. N_2O is produced by both natural and human-related sources. N_2O is emitted during agricultural and industrial activities, as well as during the combustion of fossil fuels and solid waste. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic (fatty) acid production, and nitric acid production.

Fluorocarbons. Fluorocarbons are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane with chlorine and/or fluorine atoms. Chlorofluorocarbons are nontoxic, nonflammable, insoluble, and chemically nonreactive in the troposphere (the level of air at Earth's surface). Chlorofluorocarbons were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone; therefore, their production was stopped as required by the Montreal Protocol. PFCs and HFCs are synthetic gases used primarily to replace Chlorofluorocarbons in similar types of uses while preventing ozone destruction; however, these gases have long atmospheric lifetimes.

Sulfur Hexafluoride. SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Global Warming Potential

GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, because methane and N_2O are approximately 25 and 298 times more powerful than CO_2, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO_2 has a GWP of 1). CO_2e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to quantify CO_2e.

To comply with international reporting standards under the United Nations Framework Convention on Climate Change, official emission estimates for California and the U.S. are reported using Fourth Assessment Report GWP values (IPCC 2007). By applying the GWP ratios, CO_2e emissions can be tabulated in metric tons (MT) per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 3.7-1, *Global Warming Potentials and Atmospheric Lifetimes*. As shown in Table 3.7-1, the GWP for common GHGs ranges from 1 (CO_2) to 22,800 (SF_6).

Table 3.7-1
GLOBAL WARMING POTENTIALS AND ATMOSPHERIC LIFETIMES

Greenhouse Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50-200	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	114	298
HFC-134a	14	1,430
PFC: Tetrafluoromethane (CF_4)	50,000	7,390
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Source: IPCC 2007
HFC = hydrofluorocarbon; PFC = perfluorocarbon

3.7.1.3 Greenhouse Gas Inventories

Worldwide and National Greenhouse Gas Inventory

In 2023, total anthropogenic GHG emissions worldwide were estimated at 50,800 million metric tons (MMT) of CO_2e emissions (Climate Watch 2023). The five largest emitting countries together account for about 52 percent of total global GHG emissions: China (26 percent), the U.S. (11 percent), India (8 percent), Brazil (4 percent), and Indonesia (3 percent). These countries also have the highest CO_2 emission levels (Climate Watch 2023).

Per the U.S. Environmental Protection Agency (USEPA) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022, total U.S. GHG emissions were approximately 6,343.2 MMT CO_2e in 2022 (USEPA 2024). The primary GHG emitted by human activities in the U.S. was CO_2, which represented approximately 79.7 percent of total GHG emissions (5,053 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil fuel combustion, which accounted for approximately 93 percent of gross CO_2 emissions in 2022 (4,699.4 MMT CO_2e). Relative to 1990, gross U.S. GHG emissions in 2022 were lower by 3.0 percent, down from a high of 15.2 percent above 1990 levels in 2007. Gross emissions increased from 2021 to 2022 by 0.2 percent (14.4 MMT CO_2e). Net emissions (i.e., including sinks) were 5,489 MMT CO_2e in 2022. Overall, net emissions increased by 1.3 percent from 2021 to 2022 and decreased by 16.7 percent from 2005 levels. Between 2021 and 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic (USEPA 2024).

State Greenhouse Gas Inventory

The California Air Resources Board (CARB) performed statewide inventories for the years 1990 to 2023, as shown in Table 3.7-2, *California State Greenhouse Gas Emissions by Sector*. The inventory is divided into seven broad sectors of economic activity: agriculture, commercial and residential, electricity generation, high GWP, industrial, recycling and waste, and transportation, (CARB 2026a). For comparison, the 1990 baseline inventory for AB 32 is also shown in Table 3.7-2 (CARB 2007). Emissions are quantified in MMT CO_2e.

Table 3.7-2
CALIFORNIA GREENHOUSE GAS EMISSIONS BY SECTOR

Sector	Emissions (MMT CO_2e)			
	1990	2000	2010	2023
Agriculture	18.9 (4%)	32.3 (7%)	33.7 (8%)	29.2 (8%)
Commercial and Residential	44.1 (10%)	44.8 (10%)	46.3 (11%)	43.3 (12%)
Electricity Generation	110.5 (26%)	104.7 (23%)	90.3 (21%)	57.2 (16%)
High Global Warming Potential	-	6.6 (1%)	13.8 (3%)	21.4 (6%)
Industrial	105.3 (24%)	86.6 (19%)	82.4 (19%)	66.9 (19%)
Recycling and Waste	-	7.1 (2%)	7.9 (2%)	8.6 (2%)
Transportation	150.6 (35%)	176.5 (38%)	161.9 (37%)	133.7 (37%)
Unspecified Remaining	1.3 (<1%)	0.0 (0%)	0.0 (0%)	0.0 (0%)
Total	**430.7**	**458.7**	**436.2**	**360.4**

Source: CARB 2007 and CARB 2026a
MMT = million metric tons; CO_2e = carbon dioxide equivalent

As shown in Table 3.7-2, statewide GHG source emissions totaled 430.7 MMT CO_2e in 1990, 458.7 MMT CO_2e in 2000, 436.2 MMT CO_2e in 2010, and 360.4 MMT CO_2e in 2023. Transportation-related emissions consistently contribute the most GHG emissions, followed by industrial and electricity generation emissions.

3.7.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to GHG emissions is provided below.

3.7.2.1 Federal

Federal Clean Air Act

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that CO_2 is an air pollutant, as defined under the federal CAA, and that the USEPA has the authority to regulate emissions of GHGs. The USEPA then established the Endangerment Finding in 2009, concluding that GHGs (including CO_2, CH_4, N_2O, HFC, PFC, and SF_6) threaten the public health and welfare of the American people (USEPA 2026). This action was a prerequisite to finalizing the USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA).

On June 30, 2022, the U.S. Supreme Court decision published in *West Virginia v. U.S. Environmental Protection Agency* overturned the USEPA's Clean Power Plan rule which cited Section 111(d) of the federal CAA for authority to set limits on CO_2 emissions from existing coal- and natural-gas-fired power plants. The June 30, 2022 decision does not overturn the April 2, 2007 decision; however, it may limit the USEPA's authority to develop rules limiting GHG emissions without clear congressional authorization.

On February 12, 2026, the USEPA rescinded the 2009 Endangerment Finding, thus removing the federal obligation to regulate pollutants such as CO_2, CH_4, N_2O, HFC, PFC, and SF_6 that had previously been identified as potential threats to public health and welfare. Litigation remains ongoing; however, the recission may further restrict the USEPA's ability to implement existing and future regulations limiting

GHG emissions. Regardless of these federal regulatory changes, California retains independent authority to establish goals for GHG emissions reduction and regulate GHG emissions from certain sources under state law, as described in Section 3.7.2.2, below.

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the NHTSA worked together on developing a national program of regulations to reduce GHG emissions and improve fuel economy of light-duty vehicles. The USEPA established the first-ever national GHG emissions standards under the federal CAA, and the NHTSA established Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking that established standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025.

In December 2021, USEPA issued a new rule formally adopting standards previously proposed in August 2021 for model years 2023 and 2024 and finalizing more stringent standards than previously proposed for model years 2025 and 2026. The rule assumes a 17 percent EV market penetration by 2026. Although this is a departure from the NHTSA CAFE standards, USEPA did coordinate with NHTSA during the development of the new standards. On March 20, 2024, USEPA announced new, more ambitious final standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027. The final standards build upon USEPA's final standards for federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026 and leverages advances in clean car technology to result in benefits to Americans ranging from reducing climate pollution, to improving public health, to saving drivers money through reduced fuel and maintenance costs. The standards would phase in over model years 2027 through 2032.

3.7.2.2 State

Given the wide range of GHG-related policies enacted by the State of California, the statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. Refer to Section 3.5, *Energy*, for discussion of regulations related to building energy. The following describes executive orders (EOs), legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

Executive Order S-3-05

On June 1, 2005, EO S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada mountain range, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to year 2000 levels by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. EOs are not laws and can only provide the governor's direction to state agencies to act within their authority. Therefore, legislation is required to enact the goals of EO S-3-05 and establish frameworks for statewide implementation. AB 32, described below, mandated the 2020 GHG emissions reduction goal of EO S-3-

05. The 2050 GHG emissions reduction goal of EO S-3-05 has not been enacted by any legislation and remains only a goal of the EO.

Assembly Bill 32 – Global Warming Solution Act of 2006

The California Global Warming Solutions Act of 2006 (AB 32 and Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561-38565, 38570, 38571, 38574, 38580, 38590, 38592-38599), widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 enacted the year 2020 GHG emission goals of EO S-3-05.

Executive Order B-30-15

On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28-nation European Union. The emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions 80 percent under 1990 levels by 2050. Senate Bill (SB) 32, described below, mandates the 2030 GHG emission reduction goals of EO B-30-15.

Senate Bill 32

SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the state's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

Assembly Bill 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, *The California Climate Crisis Act* declares it the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO_2 from the atmosphere (carbon capture), and almost complete transition away from fossil fuels.

Senate Bill 905

SB 905, *Carbon sequestration: Carbon Capture, Removal, Utilization, and Storage Program*, also approved by Governor Newsom on September 16, 2022, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO_2 removal technologies and facilitate the capture and sequestration of CO_2 from those technologies, where appropriate. SB 905 is an integral part of achieving the state policies mandated in AB 1279.

California Air Resources Board Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across society and the economy to reduce emissions and reach established climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below a business as usual scenario. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG emissions targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants. The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in short-lived climate pollutants; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

Renewable Energy and Energy Procurement

Senate Bill 1078

SB 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable energy generation by the utilities equivalent to at least 1 percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently revised as described below.

Senate Bill 1368

SB 1368 (September 2006) required the California Energy Commission (CEC) to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local, publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission.

Executive Order S-14-08

EO S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency (CNRA), through collaboration with the CEC and California Department of Fish and Wildlife (CDFW; formerly the California Department of Fish and Game), was directed to lead this effort.

Executive Order S-21-09 and Senate Bill X1-2

EO S-21-09 (September 2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the California Public Utilities Commission and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs or impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1-2 expanded the RPS by establishing a renewable energy target for the total electricity sold to retail customers in California per year of 20 percent by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

Senate Bill 350

SB 350 (October 2015, Clean Energy and Pollution Reduction Act) further expanded the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year being from renewable sources by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the California Public Utilities Commission, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. Regarding mobile sources, SB 350 establishes California Public Utilities Code Section 740.12, which involves a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for the achievement of the state's 2030 and 2050 GHG emission reduction targets.

Senate Bill 100

SB 100 (2018) increased the renewable energy standards set forth in SB 350, establishing that of the total electricity sold to retail customers in California per year, 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California by 2045. This bill also requires that the achievement of 100 percent zero-carbon electricity resources does not increase carbon emissions elsewhere in the western grid and that the achievement does not occur through resource shuffling.

Senate Bill 1020

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources:90 percent by December 31, 2035; 95 percent by December 31, 2040; and 100 percent by December 31, 2045.

Mobile Sources

Assembly Bill 1493 and Advanced Clean Cars

AB 1493 (Pavley) requires that CARB develop and adopt regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State." On September 24, 2009, CARB adopted amendments to the Pavley regulations that intended to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California's enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance flexibility. The amendments also prepared California to merge its rules with the federal CAFE rules for passenger vehicles (CARB 2026b).

In January 2012, CARB approved Advanced Clean Cars I, a new emissions-control program for model years 2017 through 2025 including low emissions vehicle and zero-emissions vehicle criteria. The Advanced Clean Cars II regulations were adopted in 2022, imposing the next level of low-emission and zero-emission vehicle standards for model years 2026 through 2035 that contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality targets.

On May 22, 2025, the U.S. Congress voted to eliminate the USEPA waivers for California's Advanced Clean Trucks and Heavy-Duty Omnibus regulations. Similarly, on June 12, 2025, President Donald Trump signed a Congressional Review Act resolution to revoke CARB's waivers for Advanced Clean Cars II. Immediately after President Trump signed the resolutions, California's Attorney General Rob Bonta, along with Governor Gavin Newsom and a coalition of 10 other states, sued the Trump administration. The lawsuit is still pending. Governor Newsom also signed EO N-27-25, calling on CARB to develop an Advanced Clean Cars III regulation if the federal disapproval of the Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Omnibus regulations is not invalidated in court.

Executive Order S-01-07

EO S-01-07, signed by Governor Schwarzenegger on January 18, 2007, directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by the year 2020. It ordered a Low Carbon Fuel Standard (LCFS) for transportation fuels to be established for California and directed CARB to determine whether a LCFS could be adopted as a discrete early action measure pursuant to AB 32. CARB approved the LCFS as a discrete early action item with a regulation adopted and implemented in April 2010. Although challenged in 2011, the Ninth Circuit Court of Appeals reversed the District Court's opinion and rejected arguments that implementing a LCFS violates the interstate commerce clause in September 2013. CARB, therefore, is continuing to implement the LCFS statewide.

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the state's metropolitan planning organizations (MPOs). CARB periodically reviews and updates the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP. Qualified projects consistent with an approved SCS or alternative planning strategy categorized as "transit priority projects" receive incentives to streamline CEQA processing.

Executive Order N-79-20

EO N-79-20, signed by Governor Newsom on September 23, 2020, establishes three goals for the implementation of zero emissions vehicles in California: first, 100 percent of in-state sales of new passenger cars and trucks will be zero-emissions by 2035; second, 100 percent of medium- and heavy-duty vehicles in the state will be zero-emissions vehicles by 2045 for all operations where feasible, and by 2035 for drayage trucks; and third, 100 percent of off-road vehicles and equipment will be zero emissions by 2035 where feasible.

Solid Waste

Assembly Bill 939

In 1989, AB 939, known as the Integrated Waste Management Act (California PRC Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board to oversee a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of 25 percent by 1995 and 50 percent by the year 2000 for all solid waste through source reduction, recycling, and composting activities.

Assembly Bill 341

The state legislature enacted AB 341 (California PRC Section 42649.2), amending the Integrated Waste Management Act to include a provision declaring that it is the policy goal of the state that no less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops. In August 2015, CalRecycle published a discussion document titled *AB 341 Report to the Legislature*, which identified five priority

strategies that CalRecycle believed would assist the state in reaching the 75 percent goal by 2020, legislative and regulatory recommendations, and an evaluation of program effectiveness (CalRecycle 2019).

Assembly Bill 1826

AB 1826 (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape, and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Senate Bill 1383

SB 1383 (Chapter 395, Statutes of 2016) established targets to achieve a 50 percent reduction in the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction from the 2014 level by 2025. CalRecycle was granted the regulatory authority required to achieve the organic waste disposal reduction targets and established an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025 (CalRecycle 2019).

Water

Executive Order B-29-15

In response to an ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25 percent relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increased the requirements for landscape water use efficiency and broadened its applicability to include new development projects with smaller landscape areas.

Executive Order B-37-16

Issued in May 2016, EO B-37-16 directed the State Water Resources Control Board (SWRCB) to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state. The SWRCB also developed a proposal to achieve a mandatory reduction of potable urban water usage that built off the mandatory 25 percent reduction called for in EO B-29-15. The SWRCB and Department of Water Resources were required to develop new, permanent water use targets that built upon the existing state law requirements to achieve 20 percent reduction in urban water usage by 2020. EO B-37-16 also specifies that the SWRCB permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non-recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.

Executive Order N-10-21

In response to a state of emergency due to severe drought conditions, EO N-10-21 (July 2021) called on all Californians to voluntarily reduce their water use by 15 percent from their 2020 levels. Actions suggested in EO N-10-21 include reducing landscape irrigation, running dishwashers and washing machines only when full, finding and fixing leaks, installing water-efficient showerheads, taking shorter showers, using a shut-off nozzle on hoses, and taking cars to commercial car washes that use recycled water.

Other State Actions

Senate Bill 97

SB 97 (Dutton) (August 2007) directed the Governor's Office of Planning and Research (now named the Governor's Office of Land Use & Climate Innovation) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Governor's Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (Governor's Office of Planning and Research 2008). The advisory further recommended that the lead agency determine the significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

3.7.2.3 Regional

San Diego Association of Government's Regional Plan

The San Diego Association of Government's (SANDAG's) 2025 Regional Plan (Regional Plan; SANDAG 2025) combines the RTP, SCS, and Regional Comprehensive Plan. As such, the Regional Plan must comply with specific state and federal mandates. These include an SCS, per SB 375, that achieves GHG emissions reduction targets set by CARB; compliance with federal civil rights requirements (Title VI); environmental justice considerations; air quality conformity; and public participation.

3.7.2.4 District

California Community Colleges Board of Governors Climate Action and Sustainability Framework

The California Community Colleges Board of Governors Climate Action and Sustainability Framework (California Community Colleges 2025) is a comprehensive systemwide plan that builds on the 2019 Climate Change and Sustainability Policy to guide all 116 colleges in the California Community Colleges system toward measurable environmental, social, and educational progress. It calls on community college districts throughout the state to set benchmarks and track their advancement toward 2025, 2030, and 2035 goals. The framework focuses on reducing GHG emissions, integrating sustainability into campus operations, and expanding climate-focused curriculum and workforce development.

San Diego Community College District Climate Action Plan

The District's 2023 Climate Action Plan (CAP; District 2023) establishes a 2022 District GHG inventory, which determined that the District's carbon footprint was 62,325 MT CO_2e per year. The main source of these emissions was commuter mobile sources (commuter trips to campus by staff, faculty, and students), which accounted for 73.35 percent of the District's GHG emissions. This was followed by lesser emissions associated with natural gas used in fuel cells, natural gas used for space and water heating, and purchased electricity. The District CAP additionally includes various recommendations for next steps but does not make commitments regarding GHG emission reductions or specific implementation actions. In accordance with CEQA Guidelines Section 15183.5, the District CAP is not a CEQA-qualified CAP and therefore cannot be used for streamlining GHG analyses for future District development projects.

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and Sustainability Levels. Related to GHG emissions, this includes Materials Impact Goal 2, which outlines the District goal of providing a healthy environment that does not abuse material resources and improves health, with a key performance indicator of maintaining optimal CO_2 levels through the use of materials that are low-carbon, recycled, or responsibly sourced. The Sustainability Levels framework included in this section is further described below.

Sustainability Levels

The District's Sustainability Levels are designed to recognize, measure, and promote sustainable practices across District campuses and facilities. They provide a tiered rating system that encourages environmentally responsible design, construction, and operations. All District capital projects, including new construction, major renovations, and modernization, are required to incorporate the principles outlined in the District Sustainability Levels and meet applicable local, state, and District-adopted sustainability policies. District-adopted sustainability standards include the following:

- Each campus shall facilitate and maintain an ongoing waste recycling program that establishes where facilities on campus will handle recycled materials including paper, cardboard, glass, plastics, and metal.
- Renewable woods shall be specified and detailed.
- The designer shall specify the Carpet and Rug Institute's Green Label Plus Program. All carpet cushion installed in the building shall have low emitting materials and backing.
- The District's Facilities Services have adopted a program of Green cleaning materials and techniques.

The District's Sustainability Levels include categories with specific requirements that each have an assigned point value. The categories include project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation. A scorecard is filled out based on the requirements the project achieves, which determines the sustainability level for the project from the following:

- Baseline/ Sagebrush (Baseline Sustainability) – Meets the District's minimum sustainability standards, with basic energy and water conservation measures.
- Certified/ Coast Live Oak (Sustainable Performance) – Demonstrates significant sustainable strategies.
- Silver/ Torrey Pine (High-Performance Green Building) – Meets advanced sustainable quality benchmarks.
- Gold/ Redwood (Leadership in Sustainability) – Implements innovative sustainability strategies.
- Platinum/ Sequoia (Exemplar of Sustainability) – Sets model for sustainable education facilities.

All final programming documents must contain a section related to sustainability. The conceptual design for new building projects must have sustainable features that achieve the Certified/Coastal Live Oak level at a minimum. Conceptual design schemes for major renovation projects should have sustainable features and may be required to achieve a Certified/Coastal Live Oak level; however this is determined on a case-by-case basis based on the feasibility of incorporating such features into a renovation project.

District Board Policies and Administrative Procedures

Board Policy 6970: Green Building Policy and Major Renovation Standards. The Board of Trustees has established a Green Building Policy and Major Renovation Standards to provide District students, faculty and staff with working and learning environments that are healthy, thermally, visually and acoustically comfortable; energy efficient; material efficient; water efficient; easy to maintain and operate; safe and secure and sited in an environmentally responsible manner. In accordance with this Board Policy, the District will select architects, engineers, and other professionals who have demonstrated expertise in sustainable design and are Leadership in Energy and Environmental Design (LEED) accredited as deemed appropriate as well as encourage District personnel to become familiar with these standards.

Administrative Procedure 6970: Green Buildings. The purpose of this procedure is to provide guidance for implementing District policies and standards for the design and construction of green buildings and renovations. Efficient energy use and efficiently designed buildings are central to resource sustainability efforts of the District, City, and state. Energy conservation in building design (1) reduces the operating costs of the District, (2) reduces the carbon footprint of the District, and (3) provides environmental education. This Administrative Procedure goes on to outline criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a Leadership in Energy and Environmental Design for New Construction (LEED-NC) gold rating, and requiring that at least 5 percent of a project's total energy is generated on site from renewable sources.

3.7.2.5 Local

City of San Diego Climate Action Plan

On August 2, 2022, the San Diego City Council adopted the 2022 CAP update to establish a community-wide goal and roadmap to net-zero emissions by 2035. The 2022 CAP includes the following six strategies: decarbonization of the built environment, access to clean and renewable energy, mobility and land use, circular economy and clean communities, resilient infrastructure and healthy ecosystems, and emerging climate actions (City 2022). The City is in the process of preparing a Climate Action Plan Update to maintain alignment with state targets and goals for reducing emissions, which is anticipated to be complete in 2027.

As proposed in the 2022 CAP, in October 2022, the City Council approved an amendment to the Land Development Code (San Diego Municipal Code Chapter 14, Article 3, Division 14), which established the CAP Consistency Regulations. The CAP Consistency Regulations replaced the CAP Consistency Checklist previously established by the City's 2015 CAP as the measures that could be implemented on a project-by-project basis to streamline evaluation of GHG emissions under CEQA pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Implementation of these measures would ensure that new development projects are consistent with relevant CAP strategies that work toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impact analysis of GHG emissions.

3.7.3 Thresholds of Significance

Given the relatively small levels of GHG emissions generated by a typical development in relation to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant, direct impacts to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG emissions from new

development could result in significant, cumulative impacts with respect to climate change. Therefore, the potential for a significant GHG emissions impact is limited to cumulative impacts.

Thresholds used to evaluate potential GHG emissions impacts are based on CEQA Guidelines Appendix G. A significant GHG emissions impact could occur if implementation of the proposed project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The determination of significance for GHG emissions is governed by CEQA Guidelines 15064.4, titled "Determining the Significance of Impacts from Greenhouse Gas Emissions." CEQA Guidelines Section 15064.4(a) states, "[t]he determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to … [use a quantitative model or qualitative model]." CEQA Guidelines Section 15064.4(b) clarifies that a lead agency should consider the following factors when determining the significance of impacts from GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting.

2. Whether project emissions exceed a threshold of significance that the lead agency determines applies to a project.

3. The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, consistent with CEQA Guidelines Section 15064.4, the GHG emissions analysis for the project relies upon a threshold based on the exercise of careful judgment and believed to be appropriate in the context of the project.

Neither the State of California, SDAPCD, nor District has adopted a quantitative emission-based threshold to determine significance for GHG emissions associated with campus development under CEQA. In the absence of an adopted numeric threshold, the significance of GHG emissions for the project is evaluated based on consistency with statewide goals for the reduction of GHG emissions as outlined in the 2022 Scoping Plan. As the California Supreme Court held in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal. 4th 204), the evaluation of a project based on its effect on California's efforts to meet long-term climate goals is an appropriate significance criterion under CEQA. A project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal. 4th 220-223; Bay Area Air District 2022).

As discussed further in Section 3.7.2.2, the 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. Appendix D to the 2022 Scoping Plan specifically includes recommendations for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies and approval of new land use development. Project consistency with these locally recommended strategies would demonstrate that proposed development is in alignment with state goals and incorporates the design features necessary to contribute its fair share to the state's goal of carbon neutrality by 2045. Therefore, if the project complies with the local strategy recommendations, it can be found to contribute its "fair share" to achieve the state's long-term climate goals and have a less than significant GHG emissions impact.

3.7.4 Impact Analysis

3.7.4.1 Greenhouse Gas Emissions

Threshold 1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Discussion

Project-Generated Emissions

CEQA Guidelines Section 15064.4 states, "[a] lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project." While project GHG emissions impacts are based on consistency with the City's CAP, the following discussion presents an estimate of the GHG emissions generated by project construction and operation for informational purposes.

GHG emissions associated with the project were calculated using CalEEMod, Version 2022.1, as further described in Section 3.2.4.2 for construction, mobile, area, and aircraft engine testing. For the assessment of GHG emissions, the model inputs also account for electricity use, water use and wastewater generation, solid waste disposal, and refrigerants. Per the District Architect, the project would consume between 200,000 and 400,000 kilowatt-hours of electricity per year. This analysis conservatively assumed consumption would be 400,000 kilowatt-hours per year. The District Architect estimated the project would consume 273,750 gallons of indoor water per year and 24,000 gallons of outdoor water per year. However, the actual amount of outdoor water that would be consumed by the project would be less as this estimation assumed that the project would include the installation of landscaping which has been subsequently removed from the project. As such, the modeling of emissions associated with water usage represents a conservative analysis. The District Architect additionally estimated that the project would generate 18 tons of solid waste per year. Refrigerant source emissions were modeled based on CalEEMod defaults. The modeling inputs are explained further in Section 4.1 of Appendix B to the EIR.

Construction Emissions

GHG emissions would be associated with construction of the project through the use of off-road heavy equipment and vehicle trips from construction worker, vendor, and haul trips. An inventory of construction GHG emissions is provided below for informational purposes. GHG emissions associated with construction of the project were estimated using CalEEMod, as described in Section 3.2.4.2.

Construction emissions calculations and model outputs are provided in Appendix A of Appendix B. Table 3.7-3, *Construction GHG Emissions by Year*, presents the summary of the total GHG emissions associated with the construction of the project.

Table 3.7-3
CONSTRUCTION GHG EMISSIONS BY YEAR

Year	Total Emissions (MT CO_2e)
2027	52.88
2028	243.49
Total Construction Emissions	**296.37**

Source: HELIX 2026 (Appendix B)
MT = metric tons; CO_2e = carbon dioxide equivalent

Operational Emissions

The GHG emissions associated with buildout of the project were estimated using CalEEMod as described above and in Section 3.2.4.2. For informational purposes, the project's total annual GHG emissions for the first full year of operation are shown in Table 3.7-4, *Operational GHG Emissions*. Appendix A of Appendix B contains the CalEEMod output files.

Table 3.7-4
OPERATIONAL GHG EMISSIONS

Emission Sources	2029 Emissions (MT CO_2e)
Vehicular (Mobile)	171.76
Area	0.26
Energy	8.55
Water/Wastewater	0.42
Solid Waste	5.62
Refrigerants	0.01
Aircraft Engine Testing	3.46
Total[1]	**190.08**

Source: HELIX 2026 (Appendix B)
[1] Totals may not sum due to rounding.
GHG = greenhouse gas; MT = metric tons; CO_2e = carbon dioxide equivalent

Scoping Plan Consistency Analysis

The Scoping Plan (approved by CARB in 2008 and updated in 2014, 2017, and 2022) provides a framework to reduce California's GHG emissions in accordance with AB 32. The 2022 Scoping Plan identified additional GHG reduction measures necessary to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045 in accordance with goals set in AB 1279. The Scoping Plan requires CARB and other state agencies to adopt regulations and other strategies to reduce GHGs. As many of the strategies identified in the Scoping Plan are not directly applicable to specific projects, the 2022 Scoping Plan included Appendix D providing recommendations and clarification on local GHG-reduction strategies and project-level environmental review. As described in Section 4.2.2, consistency with the 2022 Scoping Plan was determined to be an appropriate methodology for assessment of project GHG emissions impact significance as

implementation of these strategies would represent the project's "fair share" contribution to meeting state GHG reduction targets.

Table 1 of Appendix D of the 2022 Scoping Plan provides impactful GHG reduction strategies that can be implemented by local governments that address the three local priority areas: (1) transportation electrification, (2) VMT reduction, and (3) building electrification. These areas and strategies are designated as "priority" because they are the GHG reduction opportunities over which local governments have the most authority and that have the highest GHG reduction potential. The project's consistency with these strategies is provided in Table 3.7-5, *Scoping Plan Consistency Analysis*.

Table 3.7-5
SCOPING PLAN CONSISTENCY ANALYSIS

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
Transportation Electrification	Convert local government fleets to zero emission vehicles (ZEVs) and provide EV charging at public sites	**Consistent.** The project's parking area would provide approximately 70 parking spaces for students and faculty and would include 9 EV ready spaces and 7 EV charging spaces. An additional nine parking spaces would be provided along the southern perimeter of the proposed Miramar College AIC which would include one additional EV charging station. Development of the project would not conflict with policies regarding the conversion of fleets to ZEVs.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)	**Consistent.** The project would not inhibit the implementation of City or other jurisdiction's actions to support statewide ZEV deployment. The District is currently in the process of purchasing ZEVs for maintenance and facilities staff as vehicles are replaced. As described above, vehicle charging locations within project parking areas would also be available.
VMT Reduction	Reduce or eliminate minimum parking standards	**Consistent.** The District does not have minimum parking standards. Although the project would include new parking facilities, these improvements would accommodate student growth and would not result in increased VMT due to the provision of excessive parking (refer to discussion of parking pricing below).
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements	**Consistent.** Although the District is not subject to municipal regulations or plans such as the City's Complete Streets Policy or General Plan Circulation Element, the project would not impede implementation of these policies or future complete street improvements on City roadways.

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
VMT Reduction (cont.)	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.	**Consistent.** The project site is located within a transit priority area with easy access to public transit services. The District would continue to provide transit passes for sale at the discounted student rate established by Metropolitan Transit System.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking	**Consistent.** The project would provide accessible pathways throughout the project site to accommodate student and faculty access to the Miramar College AIC and associated parking and engine testing pad area. The proposed pedestrian improvements would be constructed with ADA-compliant curb ramps and high-contrast tactile warning strips (i.e., yellow truncated dome pads). There are various planned transit, pedestrian, and bicycle facilities along Kearny Villa Road and Aero Drive in the vicinity of the project site. Project implementation would not preclude the City from implementing these planned improvements.
	Implement parking pricing or transportation demand management pricing strategies	**Consistent.** Parking on campus facilities requires the purchase of a permit, which would align with pricing strategies to encourage the use of public transit in the area. Carpooling is also encouraged through the discounted carpool parking permit option.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)	**Consistent.** The project would expand the existing instruction facility allowing for 15 additional class sessions per week. As mentioned previously, the project site is within a transit priority area with easy access to public transit services.
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements)	**Consistent.** The project would be an infill development within the boundaries of the MYF, which is fully developed and surrounded by urban development. Therefore, no greenfield conversion would occur.

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses	**Consistent.** The project's development would be all-electric in accordance with District sustainability policies outlined in the District Design Guidelines and Standards Manual. Construction of District facilities are required to comply with Title 24 standards, and projects are further incentivized to reach energy efficiency above the Title 24 baseline as outlined in the District's Sustainability Levels framework.
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)	**Consistent.** The project would replace an existing building with new construction that would be all electric and more energy efficient.
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances	**Consistent.** The project would replace an existing building with new construction that would be all electric and more energy efficient.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)	**Consistent.** The District has previously used programs intended to increase renewable energy generation, such as power purchase agreements for solar panels on other campuses. While no specific renewable energy facilities are part of the project, the District would continue to evaluate the feasibility of incorporating such technology on campuses as it is available and economically feasible.
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings)	**Consistent.** Additional renewable energy production and storage technologies are considered by the District as feasible.

Source: CARB 2022

As shown in Table 3.7-5, the project would not impede implementation of the GHG reduction strategies identified in the 2022 Scoping Plan. Rather, many of the District policies would be consistent with these GHG reduction strategies. Therefore, buildout of the project would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment. **Impacts would be less than significant**. No mitigation is required.

3.7.4.2 Greenhouse Gas Emission Reduction Plans

Threshold 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Impact Discussion

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Impacts are evaluated based on whether the project would conflict with or obstruct implementation of CARB's 2022 Scoping Plan, the California Community Colleges Sustainability and Climate Action goals, or the City's CAP.

California Air Resources Board 2022 Scoping Plan

As discussed in Section 3.7.2.2, the 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. Appendix D to the 2022 Scoping Plan includes recommendations for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies and approval of new land use development. As demonstrated in Section 3.7.4.1 above, the project would be consistent with the priority GHG reduction strategies identified in Appendix D of the 2022 Scoping Plan and therefore address the three key priorities identified by the 2022 Scoping Plan for local jurisdictions.

California Community Colleges Board of Governors Climate Action and Sustainability Framework

The California Community College Climate Action and Sustainability Framework provides goals and recommendations for community college districts in response to the Board of Governors Climate Change and Sustainability Policy. The latest version of this framework aligned the California Community Colleges with the 2017 Scoping Plan; therefore, the analysis provided in Section 3.7.4.1 related to the 2022 Scoping Plan demonstrates that the project would be consistent with the more recent state goals and recommendations.

City of San Diego 2022 Climate Action Plan

The first step in determining CAP consistency for development projects is to assess the project's consistency with the growth projections used in the development of the CAP. Because the CAP uses growth projections based on implementation of the adopted General Plan and Community Plans, the first step in determining a project's consistency with the CAP is to demonstrate its consistency with the land use and zoning designations.

As discussed previously, the project proposes the redevelopment and expansion of an instruction facility. The project would continue the existing use of the project site and would be consistent with the adjacent airport uses and surrounding uses. The project site is mapped as an Institutional land use in the Kearny Mesa Community Plan and would continue this land use with project implementation. Therefore, the project is consistent with the growth projections used in the development of the CAP.

The second step in demonstrating CAP consistency is implementation of the regulations set forth in San Diego Municipal Code Chapter 14, Article 3, Division 14 to ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the Climate Action Plan for the cumulative impacts analysis of GHG emissions. The CAP Consistency Regulations are applicable to development of three or more residential dwelling units, non-residential development of at least 5,000 SF, and parking facilities. Project-specific measures included in the CAP Consistency Regulations include the following:

- Pedestrian enhancements that reduce heat island effects through the planting of trees or installation of shade structures;
- Pedestrian amenities such as trash receptacles, seating, or public artwork for every 250 linear feet of street frontage;
- Provision of electric bicycle parking spaces with outlets for charging;
- Two trees planted for every 5,000 SF of lot area;

The project would be required to comply with the applicable portions of the CAP Consistency Regulations given its location on an airport property owned by the City. The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. **Impacts would be less than significant**. No mitigation is required.

3.7.5 Cumulative Impact Analysis

The geographic scope of consideration for GHG emissions is global, as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. As such, the impact analysis presented above also serves as the project's cumulative impact analysis related to GHG emissions. This approach is consistent with the supporting documentation published by the CNRA when promulgating the SB 97-related CEQA amendments, which indicated that the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact. Therefore, as identified in Section 3.7.4, above, the project would not generate GHG emissions that could have a significant impact on the environment and would not conflict with plans adopted for the purpose of reducing GHG emissions. Implementation of the project would result in **less than significant** cumulative impacts related to GHG emissions.

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3.8 Hazards and Hazardous Materials

This section addresses the potential hazards and hazardous materials impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to hazards and hazardous materials are also addressed. This section relies on the information and analysis in the Phase II Environmental Site Assessment prepared for the project site by Ninyo & Moore (Ninyo & Moore 2025), which is included as Appendix G to this EIR.

3.8.1 Environmental Setting

A "hazardous material" is defined by California Health and Safety Code Section 25501(n) as a material "that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and other materials which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

3.8.1.1 Types of Hazardous Chemicals and Exposure Pathways

Past and present land uses at the Montgomery-Gibbs Executive Airport (MYF) and surrounding properties, including industrial use waste storage and disposal, may have resulted in releases of hazardous chemicals to the environment. In addition, spills and leaks of fuel from locations where fuel was stored and dispensed could have affected the subsurface. Releases of hazardous substances along transportation corridors and deterioration of building materials that contained hazardous chemicals could also have affected the environment.

Past releases of these hazardous chemicals can leave residual contamination in soil, soil vapor, and groundwater within the project vicinity. These chemicals are classified based on their properties, persistence in the environment, and general adverse effects, as described below.

Total Petroleum Hydrocarbons

Total petroleum hydrocarbons (TPH) is a term used to describe a large family of chemical compounds that originate from crude oil and are used to make petroleum and other industrial products. Benzene, toluene, ethylbenzene, naphthalene, and xylenes are part of the more volatile fractions of TPH (gasoline mixture) and polynuclear aromatic hydrocarbons (e.g., benzo(a)pyrene) are part of the less volatile fractions (diesel and heavier mixtures). Both groups, volatile organic compounds (VOCs) and fractions that are non-volatile, can have adverse health effects based on the type of chemical, routes of exposure (inhalation, direct contact, ingestion), and the mass of chemical available for exposure.

Relative to other classes of hazardous substances, petroleum hydrocarbons degrade in aerobic conditions (in the presence of oxygen). If present in significant quantities in groundwater, TPH can exist in its own phase (as product) and will float on the surface of the water table (United States Environmental Protection Agency [USEPA] 2012).

The most common pathways for exposure to the volatile fraction of TPH is inhalation, followed by direct contact (if the pathways of exposure are complete). The most common pathway of exposure to the non-

volatile fractions of TPH is direct contact. The inhalation exposure pathway to the non-volatile fraction is incomplete (with the exception of TPH-impacted dust particles that can be inhaled in areas of soil disturbance).

Chlorinated Volatile Organic Compounds

Chlorinated volatile organic compounds (CVOCs) were commonly used for cleaning and degreasing and were associated with dry cleaning, manufacturing, and automobile maintenance at former military facilities. Some common CVOCs that can be found in the environment are tetrachloroethylene, trichloroethylene, and their breakdown products, such as cis-1.2-dichlorethene, trans-1.2-dichloroethene, and vinyl chloride. Exposure to CVOCs can result in adverse health effects. CVOCs are generally more persistent and can remain in the environment (soil, groundwater, soil vapor) for extended periods of time. CVOCs can migrate into indoor air from soil vapor and result in adverse health effects from inhalation exposure (USEPA 2012).

Lead

Lead is a heavy metal with multiple industrial and other applications. Exposed shallow soil may have been contaminated with aerially deposited lead along well-traveled transportation road corridors, aircraft runways, and taxiways, and along the aircraft flight paths, prior to the phasing out of leaded gasoline in the late 1970s. The aerially deposited lead is caused by historical emissions from vehicle and aircraft exhausts (tetraethyl lead was mixed with gasoline from the 1920s to the 1970s as an anti-knock agent).

Lead-based paint (LBP) can be found on structures built before 1978 (when it was banned in paint). Deteriorating LBP can contaminate shallow soil around the structures. Soil contaminated lead (e.g., from aerially deposited lead and LBP), when disturbed, can become airborne in dust. Exposure to lead, either through direct contact, inhalation of dust containing lead, or through ingestion (can be a problem in younger children who may ingest deteriorating LBP or soil contaminated with lead) at significant concentrations can result in adverse health effects (lead is a known neurotoxin).

Other Metals

Metals can be found in manufacturing and industrial facilities and landfills (e.g., arsenic, chromium, mercury, and copper). Although metals can be naturally occurring, in higher concentrations they can be toxic to human health. If released to the environment in significant quantities, metals are more likely to be present in shallow soil. Exposure to metals in soil can occur through direct contact and inhalation of dust containing metals. Some chemicals used in industrial processes, such as hexavalent chromium can contaminate groundwater and threaten drinking water sources.

Emerging Chemicals of Concern

Emerging chemicals of concern (ECC) include a wide array of potential pollutants, such as pharmaceuticals, personal care products, per-and polyfluoroalkyl substances, surfactants, microorganisms, microplastics, and endocrine disrupting chemicals, among others. These unregulated contaminants can occur in wastewater, reused water, drinking water or other matrices and there is often an incomplete understanding of the risk posed by these potential pollutants. Often ECCs are difficult to measure and can be linked to many current and historic sources (USEPA 2024). Areas within the project vicinity area may contain ECCs, especially where firefighting foams and suppressants have

been used (firefighting training areas, aircraft or vehicle crashes, or other areas where fires occurred) or stored. Cases under regulatory oversight may not have been tested for ECCs. ECCs may be present in the subsurface and can be harmful to human health through ingestion, direct contact, and by inhalation.

Asbestos

Asbestos is a fibrous mineral that occurs naturally in rock and soil (USEPA 2023a). It has been used in a wide variety of building materials such as insulation, roofing materials, and tiles. It has also been commonly used in automobile parts such as brakes and transmissions. Asbestos is likely present in structures within the project vicinity and may be present in shallow soil near buildings and near busy right-of-way corridors. The most common route of exposure is through inhalation of tiny particles of deteriorated (friable) asbestos containing materials (ACMs). Exposure to asbestos is harmful to human health.

Pesticides

Pesticides are chemicals used primarily for agricultural purposes. Pesticides are commonly found in shallow soil in areas where agricultural use is or was historically present. Pesticides are potentially harmful to human health through direct contact and inhalation. Based on a review of historical documents, MYF does not appear to have been historically used for agriculture. However, MYF does currently use pesticides to control vegetation growth in the runway and taxiway safety areas of the airport property.

Polychlorinated Biphenyls

Polychlorinated Biphenyls (PCBs) belong to a broad family of man-made organic chemicals and were manufactured from 1929 to 1979 (when manufacturing was banned). PCBs are chemically stable and have a high boiling point and electrical insulation, and because of these properties, were used in a wide range of industrial and commercial applications. PCBs were commonly used in electrical and hydraulic equipment, as a plasticizer in paints, plastics and rubber manufacturing, and may be found in transformers and capacitators, electrical equipment, hydraulic systems, fluorescent light ballasts, cable installation, oil-based paint, plastics caulking, adhesives, and floor finishes (USEPA 2023b). Even though they are no longer manufactured, PCBs can be released into the environment from past applications, and from the disposal or storage of PCBs wastes. The USEPA, International Agency for Research on Cancer, and the National Toxicology Program have concluded that PCBs are a probable human carcinogen (USEPA 2023b). If released to the environment, PCBs are more likely to be in soil (relative to other media) and building materials and can be harmful to human health through ingestion and direct contact.

3.8.1.2 Hazardous Materials Sites

A Hazardous Materials Technical Study was prepared for the Montgomery-Gibbs Executive Airport (Bodhi Group 2019), soil samples were collected at the project site as part of a Phase II Environmental Site Assessment (Ninyo & Moore 2025), and searches of the Department of Toxic Substances Control (DTSC) Envirostor and State Water Resources Control Board (SWRCB) Geotracker databases were utilized to assess the presence of hazardous materials sites in the project vicinity, including the project site. The Envirostor database is a geographic information system that lists Federal Superfund Sites; State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School Cleanup sites. The Geotracker database is a data management system for tracking potential impacts to

groundwater and activities that involve groundwater cleanup, such as remediation for leaking underground storage tanks.

Sites Identified in Hazardous Material Technical Study for Montgomery-Gibbs Executive Airport

Based on the review of federal, state, and local environmental regulatory agency databases in the Hazardous Material Technical Study for the Montgomery-Gibbs Executive Airport (Bodhi Group 2019), 12 properties were found to be of potential environmental concern. For the purposes of this project, only properties within 1,320 feet (approximately one-quarter of a mile) of the project site are discussed below. These locations are shown on Figure 3.8-1, *Hazardous Materials Sites*.

San Diego City Police Department, Air Support Unit/Gibbs Flying Service (3750 John J. Montgomery Drive)

This property is located approximately 1,000 feet north of the project site. At this site, two 10,000-gallon aviation fuel underground storage tanks (USTs) and one 50-gallon unleaded gasoline UST were removed between 1988 and 1991. Records indicate two unauthorized release cases (H21291-001 and -002) at the site associated with TPH-contaminated soils present following removal of the USTs. Both cases were closed for facility uses at that time (airplane parking and commercial use) and the subsurface conditions are to be reevaluated if the land uses change. The site is also associated with multiple permits for storage of and disposal of hazardous wastes including hydrocarbons, jet fuel, cleaners and solvents, waste oil, asbestos, and propane. Investigation reports on file with County Department of Environmental Health and Regional Water Quality Control Board (RWQCB) indicate violations observed were minor and related to bookkeeping. Storm water reports and Industrial Inspection Reports from 1994 through 2017 indicated that the facilities were generally in compliance with Best Management Practices (BMPs) and hazardous material storage, with the exception of a sheen occasionally observed in parking areas and fuel trucks observed not parking on secondary containment in 2017.

Spiders Aircraft Service Incorporated (3873 Kearny Villa Road)

This facility is located adjacent to the north of the project site. It is listed on the UST database with an active permit for a 250-gallon waste oil UST, and an inactive permit for a 550-gallon UST containing solvents that was removed in 1986.

National Air College/Texaco (3760 Glen H. Curtiss Road)

This facility is located approximately 1,300 feet east of the project site, within the MYF property. Two 10,000-gallon USTs were removed from this site in 1993, and soils impacted by the USTs were excavated, stockpiled, and then backfilled. An estimated 300 to 400 cubic yards of TPH-impacted soil remain at the locations of the former USTs. The case associated with the USTs was closed in 1998 for the facility use at the time (aircraft storage and maintenance) and groundwater was not believed to be at risk from contamination. The site occupant was also listed for use and disposal of waste oil, used batteries, hydrocarbon solvents, and used oil filters; however, associated violations were minor and are not an environmental concern at this time.



Source: Aerial (SanGIS, 2023), Data (Bodhi Group, 2019)

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HELIX Environmental Planning

Hazardous Materials Sites

Figure 3.8-1

San Diego City Fire Repair Facility/Rural Metro San Diego (3870/3880 Kearny Villa Road)

This property is located approximately 150 feet west of the project site and has five closed unauthorized release cases (H19194-001, -002, -003, -004, and -005). The most recent cases (-004 and -005) were due to a diesel release which affected soil and groundwater at the site. Both cases were closed in 2015. The property is also listed for storage and disposal of waste oil, cleaning solvents, propane, unleaded fuel, compressed gas, antifreeze, pharmaceutical waste, and firefighting foam concentrations. Per-and polyfluoroalkyl substances may have been released within the project vicinity in conjunction with firefighting training and the use of Class B firefighting foam.

On-Site Soil Sampling

Fourteen soil samples were collected at four on-site boring locations at the project site, consisting of one boring location on each of the exterior sides of the existing Miramar Hangar (Ninyo & Moore 2025). Arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, molybdenum, nickel, vanadium, and zinc were detected in soil samples; however, each of the detected metals were found at concentrations below the commercial/industrial DTSC screening levels, except for arsenic, which exceeded the DTSC screening levels in one sample. Arsenic levels from the sample that exceeded screening levels were compared to the DTSC California background upper bound limit of arsenic for school sites and exceeded the background limit of 12 milligrams per kilogram, with a concentration of 15 milligrams per kilogram. While one sample exceeded DTSC California background levels, arsenic levels were well below the DTSC screening levels for all other samples, indicating that arsenic is not a major environmental concern at the project site. Additionally, because the sample was collected at a depth of 15 feet below ground surface and only detected at levels exceeding background levels in one sample, contact risk with sensitive receptors is identified as low (Ninyo & Moore 2025). Samples were analyzed for lead and did not exceed soluble threshold limit concentrations regulatory limit of 5 milligrams per liter. Soil samples analyzing gasoline range organics, Jet Fuel A, and volatile organic compounds did not exceed laboratory reporting limits. Samples containing diesel range organics and oil range organics exceeded laboratory reporting limits, but did not exceed Regional Water Quality Control Board Environmental Screening Levels for commercial/industrial uses. Finally, soil samples were analyzed for polycyclic aromatic hydrocarbons and did not exceed concentrations identified in DTSC screening levels. Based on the detected constituents and the levels of each constituent detected in the sampling, constituents analyzed are not identified as an environmental concern.

Envirostor and Geotracker Databases

No sites were listed on Envirostor within 1,320 feet (approximately one quarter of a mile) from Miramar Hangar (DTSC 2026). Geotracker listed 11 sites within 1,320 feet of Miramar Hangar (SWRCB 2026). These included five sites at the San Diego City Fire Repair Facility located just west of the project site. The cases at the San Diego City Fire Repair Facility consisted of two leaking underground storage tank (LUST) sites and three cleanup program sites, all of which are identified as completed and closed cases. The remaining six sites identified in Geotracker within the search radius include a car wash, HIPP Marine Services, Kearny Mesa Exxon, a mechanic shop, Sunset Motors, and Propel Biofuels 76. All cases are listed as completed and closed except for the Propel BioFuels 76 site, which is located at 3860 Kearny Mesa Road, approximately 600 feet west of the project site (refer to Figure 3.8-1), and is listed as a LUST Cleanup Site that is open. Potential contaminants of concern identified for the site include diesel and gasoline, with ongoing groundwater monitoring occurring on a quarterly basis.

3.8.1.3 Nearby Schools

The nearest schools to the project site are Le Lycée Français de San Diego and Soille San Diego Hebrew Day School. Both of these schools are located on the south side of Aero Drive, with Le Lycée Français de San Diego located approximately 0.3 miles southeast of the site, and the Soille San Diego Hebrew Day School located approximately 0.35 miles southeast of the project site. There are no schools within one-quarter mile of the project site.

3.8.1.4 Emergency Response and Evacuation

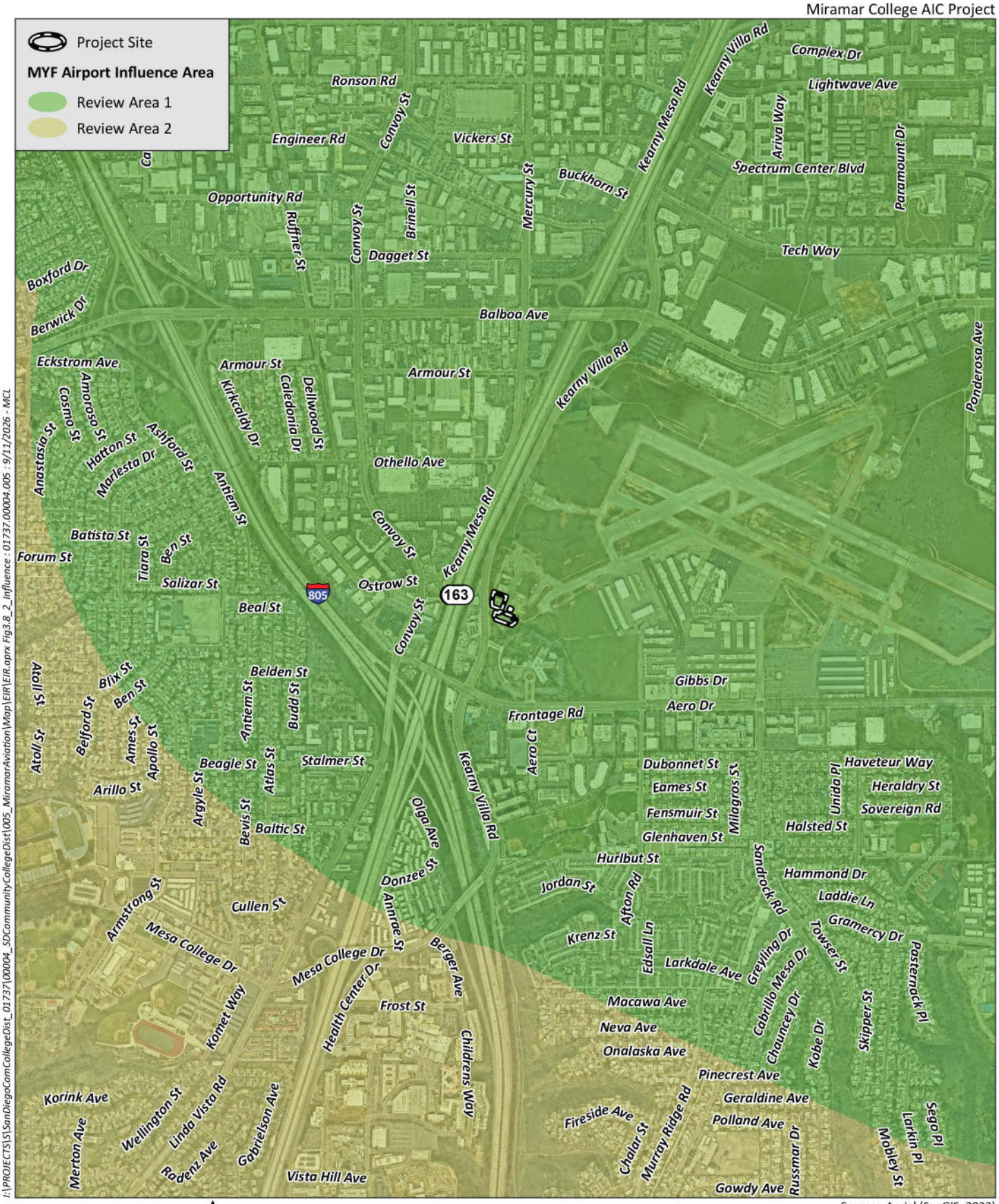
The City is a participating jurisdiction in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan, a countywide plan to identify risks and minimize damage from natural and man-made disasters (County 2023). The primary purposes of the Multi-Jurisdictional Hazard Mitigation Plan include efforts to: enhance public awareness and understanding; create a decision tool for management; promote compliance with state and federal program requirements; enhance local policies for hazard mitigation capability; provide inter-jurisdictional coordination of mitigation-related programming; and achieve regulatory compliance. Additionally, the City is a participating agency in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (County 2022). The Emergency Operations Plan is used by partner agencies within the County to respond to major emergencies and disasters. Annex Q (Evacuation) of the Emergency Operations Plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County…," with Interstate (I-) 15, State Route (SR) 52, SR 163, and I-805 identified as evacuation routes in the vicinity of the project site. Additionally, the evacuation routes near the project site identified by the County's Office of Emergency Services include Kearny Villa Road, Aero Drive, and I-5 (County 2024).

3.8.1.5 Airport Hazards

The State of California requires that the San Diego County Regional Airport Authority (SDCRAA), as the Airport Land Use Commission (ALUC), prepare an Airport Land Use Compatibility Plan (ALUCP) for each public-use airport and military air installation in San Diego County. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area (AIA) for each airport over a 20-year horizon. The City implements the adopted ALUCPs with the Airport Land Use Compatibility Overlay Zone. Projects located within the AIA are reviewed for consistency with the ALUCPs. The project site is within Review Area 1 of the ALUCP (Figure 3.8-2, *MYF Airport Influence Area*) and is also within Safety Zone 2 (Inner Approach/Departure Zone) (Figure 3.8-3, *MYF Safety Compatibility Zones*; SDCRAA 2010). The project site is also within the Overflight Area Boundary and AIA associated with San Diego International Airport (SDIA; SDCRAA 2025), and Review Area 2 of the AIA and within the Federal Aviation Regulations Part 77 Airspace Protection Combability Area associated with Marine Corps Air Station (MCAS) Miramar (SDCRAA 2008).

3.8.1.6 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped recommended Fire Hazard Severity Zones for the County, and identifies responsibility areas for fire protection, including federal, state, and local responsibility areas. CAL FIRE maintains mapping datasets that estimate fire



I:\PROJECTS\S\SanDiegoComCollegeDist_01737\00004_SDCommunityCollegeDist\005_MiramarAviation\Map\EIR\EIR.aprx Fig3.8_2_Influence : 01737.00004.005 : 9/11/2026 - MCL

0 1,500 Feet

Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

MYF Airport Influence Area

Figure 3.8-2



Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

MYF Safety Compatability Zones

Figure 3.8-3

threat potential throughout California based on presence of flammable vegetation (e.g., fuel), topography, fire history, and climate. Based on these data, areas are mapped as Fire Hazard Severity Zones and assigned one of three levels of fire hazard: moderate, high, or very high. Local jurisdictions may adopt the recommended hazard maps prepared by CAL FIRE as recommended or may increase the identified hazard area; local agencies may not decrease the hazard area from that recommended by CAL FIRE. The City has adopted Very High Fire Hazard Severity Zone (VHFHSZ) maps that add to the hazard areas recommended by CAL FIRE for its local responsibility area (City 2025). Portions of the project site are located within the VHFHSZ, including the northern portion of the proposed building site, the eastern edge of the proposed parking area, and the engine testing site, as shown in Figure 3.16-1, *Wildfire Hazard Zone*. It is noted that MYF and its immediate surroundings were not recommended as a VHFHSZ by CAL FIRE (CAL FIRE 2026a).

Wildland Urban Interface areas are another designation given to areas of the state that are at risk of fire. The Wildland Urban Interface is a zone of transition between wilderness and human civilization that experiences a heightened risk of wildfire. The project site and its immediate surroundings are not within the Wildland Urban Interface (CAL FIRE 2025).

3.8.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to hazards and hazardous materials is provided below.

3.8.2.1 Federal

U.S. Environmental Protection Agency

The USEPA works closely with other federal agencies as well as state and local governments to develop and enforce regulations under existing environmental laws. The USEPA is primarily responsible for researching and setting national standards for a variety of environmental programs, and delegates to states and tribes the responsibility for issuing permits and monitoring and enforcing compliance. When national standards are not met, the USEPA can issue sanctions and take other steps to assist the states and tribes in reaching the desired levels of environmental quality. USEPA Region 9 has jurisdiction over the southwestern United States, including San Diego County.

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act (RCRA) is the predominant federal law governing the ongoing generation and management of hazardous waste. Regulations under RCRA are codified in Title 40 of the Code of Federal Regulations (CFR), parts 239 through 282, and provide a framework for “cradle to grave” handling of hazardous waste. Specifically, this requires entities to track their hazardous waste from the point of generation to the point of recycling, reuse, or permanent disposal. The Federal Hazardous and Solid Waste Amendments of 1984 called for waste minimization and phasing out disposal of hazardous wastes to landfills, developed standards for underground storage tanks, and prescribed the process for corrective action following releases. The USEPA has the primary role of implementing RCRA, although individual states (including California, as outlined below) are also authorized to carry out provisions of the law.

Spill Prevention, Control, and Countermeasure Rule

The federal Spill Prevention, Control, and Countermeasure Rule (40 CFR 112) was enacted to provide engineering, operational, maintenance, and management strategies that minimize the potential for a spill or release of oil products, such as fuel and petroleum/lubricating oil, from certain storage and operational equipment and activities and prevent an oil spill from entering a waterway. The federal requirements of this rule apply to owners or operators of non-transportation-related, onshore and offshore facilities engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, or consuming oil or oil products. Facilities subject to the rule must prepare and implement a Spill Prevention, Control, and Countermeasure Plan.

Hazardous Materials Transportation Act of 1975

The U.S. Department of Transportation (USDOT) has the authority to regulate the transportation of hazardous materials under Title 49 of the CFR. Last amended in 2005, the Hazardous Materials Transportation Act provides minimum regulations for the transport of hazardous materials by air, land, rail, or water. The four key provisions of the law are the establishment of procedures and policies, rules for material designations and labeling, packaging requirements, and operational rules. The California Highway Patrol and California Department of Transportation (Caltrans) are the state agencies with primary responsibility for governing hazardous materials transportation permits in California, enforcing federal and state regulations, and responding to hazardous materials transportation emergencies.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, provides national guidelines for responding to releases or threatened releases of hazardous substances and maintains a trust fund to clean up known hazardous waste sites. Federal actions related to CERCLA are limited to sites on the National Priorities List for cleanup activities, with National Priorities List listings based on the USEPA Hazard Ranking System. The Hazard Ranking System is a numerical ranking system used to screen potential sites based on criteria such as the likelihood and nature of hazardous material release, and the potential to affect people or environmental resources. CERCLA was passed in 1980 and was amended in 1986 by the Superfund Amendments and Reauthorization Act.

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act made the following changes and additions to the Superfund program under CERCLA:

- The budget allotted to the trust fund for cleanup actions was increased.
- The Hazard Ranking System was revised to more accurately reflect risks that hazardous waste sites pose to human health and the environment.
- State involvement was increased, and changes were made to ensure consistency with other state and federal laws and regulations.
- There was a greater focus on permanent remedies and innovative treatment technologies.
- Citizen participation in the decision-making process was encouraged.

Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act was authorized by Title III of the Superfund Amendments and Reauthorization Act. The purpose of this act is to support emergency response preparedness and to provide the public with information regarding potential chemical hazards in their communities. The law directs emergency planning committees at the local and state level to develop emergency response plans for chemical releases. It also requires industry entities to provide information to local, state, and federal governments on the storage, use, and release of hazardous chemicals.

Lead and Asbestos Regulations

The U.S. Consumer Product Safety Commission banned the manufacture and sale of lead-containing paint for consumer use in 1978 pursuant to Title 16 of the CFR, Part 1303. This effectively prohibited the use of LBP in residential structures and other public-facing buildings. As a result, residential buildings constructed prior to 1978 may contain LBP, while those constructed thereafter are generally not expected to include lead-based coatings.

In 1989, the USEPA issued the Asbestos Ban and Phase-Out Rule under the Toxic Substances Control Act, which was meant to prohibit the manufacture, importation, processing, and distribution of most asbestos-containing products. Although this rule was largely remanded by the U.S. Court of Appeals in 1991, it established prohibitions on new uses of asbestos and permanently banned several specific ACMs. More recently, under the amended Toxic Substances Control Act authority, USEPA finalized a rule in March 2024 regulating and prohibiting ongoing uses of chrysotile asbestos, the only form of asbestos historically still imported into the United States. This rule, codified at 40 CFR Part 751, continues the federal phase-out of ACMs due to their known carcinogenic health effects.

Federal Aviation Regulations Part 77

Federal Aviation Regulations Part 77 outlines the standards for identifying structures that could be obstructions to navigable airspace, sets forth requirements for notice to the FAA of certain proposed construction or alteration, and provides for aeronautical studies of obstructions to determine their effect on the safe and efficient use of airspace. Federal law requires sponsors of proposed structures or objects (including buildings, antennas, trees, and mobile and temporary objects, such as construction cranes) that exceed 14 Code of Federal Regulations Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alteration (Form 7460-1). Notification criteria includes proposed construction or alteration that meet any of the following:

- The structure exceeds 200 feet in height above ground level at its site.
- The structure penetrates "imaginary surfaces" stretching outward and upward from an airport. The specific slope and distance depend on the longest runway:
    - Runways over 3,200 feet: 100:1 slope for a horizontal distance of 20,000 feet.
    - Runways 3,200 feet or less: 50:1 slope for a horizontal distance of 10,000 feet.
    - Heliports: 25:1 slope for a horizontal distance of 5,000 feet
    - Emit frequencies
- Any highway, railroad or other traverse way where the prescribed adjusted height would exceed the above noted criteria.

- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location.

The FAA may also require notification for structures or objects of lower height that may cause signal reception interference with navigational aids (NAVAIDs).

FAA Advisory Circular 150/5200-33B

In 2007, FAA issued Advisory Circular (AC) No. 150/5200-33B (FAA 2007) that provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public use airports. The AC also discusses airport development projects, including airport construction, expansion and renovation, affecting aircraft movement near hazardous wildlife attractants. Hazardous wildlife is defined as any species of wildlife (birds, mammals, reptiles), including feral animals and domesticated animals not under control, that are associated with aircraft strike problems, are capable of causing structural damage to airport facilities, or act as attractants to other wildlife that pose a strike hazard. Included within the AC are minimum separation criteria for land use practices that attract hazardous wildlife to the vicinity of airports. Separation distances are based on flight patterns, altitude at which most strikes happen, and National Transportation Safety Board recommendations. Land use practices discussed within the AC associated with wildlife hazards directly applicable to the proposed project include the placement and design of new stormwater management facilities, which must drain within 48 hours after a storm event.

3.8.2.2 State

California Code of Regulations Title 22

Most state and federal regulations and requirements for hazardous waste are codified in Title 22 of the California Code of Regulations (CCR), Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generation, transport, treatment, storage, and disposal facilities. California is a state fully authorized to implement RCRA; therefore, most RCRA regulations are integrated into Title 22. The DTSC regulates hazardous waste more stringently than the USEPA, however, Title 22 does not contain as many exemptions or exclusions as the equivalent federal regulations. Similar to the California Health and Safety Code (as outlined below), Title 22 also regulates a wider range of waste types and waste management activities than RCRA. While California has enacted a number of additional regulations from various CCR titles related to hazardous materials, such as wastes and toxics in CCR Titles 26 (Toxics), 23 (Waters) and 27 (Environmental Protection), state hazardous waste regulations are still commonly referred to collectively as Title 22.

California Health and Safety Code, Hazardous Materials Release Response Plans and Inventory

The DTSC has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code Section 25531, et seq., incorporates the requirements of the Superfund Amendments and Reauthorization Act and the Clean Air Act as they pertain to hazardous materials. Under the California Accidental Release Prevention Program, certain businesses that store or handle more than 500 pounds, 55 gallons, or 200 cubic feet (for gases) of acutely hazardous materials at their facilities are required to develop and submit a Risk Management

Plan to the appropriate local authorities, the designated local administering agency, and the USEPA for review and approval. The Risk Management Plan is intended to satisfy federal "right-to-know" requirements and provide basic information to regulators and first responders, including identification/quantification of regulated substances used or stored on site, operational and safety mechanisms in place (including employee training), potential on- and off-site consequences of a release, and emergency response provisions.

Under California Health and Safety Code, Division 20, Chapter 6.95, businesses handling or storing certain amounts of hazardous materials are required to prepare a Hazardous Materials Business Plan (HMBP). Recent updates to the California Health and Safety Code, such as those enacted under Assembly Bill (AB) 1716 (effective January 1, 2024), have strengthened the HMBP requirements by mandating more detailed emergency response plans and documented employee training. HMBPs must include a comprehensive inventory of hazardous materials stored on site (above specified quantities), a site-specific emergency response plan, an employee training program, and a written set of procedures and information created to minimize the effects and extent of a release or threatened release of a hazardous material. HMBPs must be prepared prior to facility operation and updated if there are significant changes in business location, ownership, or operations.

Pursuant to California Health and Safety Code Chapter 6.11, the California Environmental Protection Agency (CalEPA) established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated six existing state programs related to hazards and hazardous materials. The six programs consolidated under the Unified Program are the Aboveground Petroleum Storage Act Program, California Accidental Release Prevention Program, HMBP requirements, Hazardous Materials Management and Inventory Program, Hazardous Waste and Hazardous Waste Treatment Program, and Underground Storage Tank Program. The Unified Program also allows the designation of Certified Unified Program Agencies to implement associated state regulations within their jurisdictions.

Cortese List

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List. The Cortese List is a planning document used by state and local agencies to provide information about hazardous materials release sites. Government Code Section 65962.5 requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Waste Control Act

The Hazardous Waste Control Act is implemented by regulations contained in CCR Title 26 that describe requirements for the proper management of hazardous wastes. The act created the state hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Hazardous Waste Control Act and Title 26 regulations list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, transporting, and disposing of such wastes. Under these regulations, the generator of hazardous waste material must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with the DTSC.

California Building Standards Code

Refer to Section 3.16.2.1 for an overview of fire-specific building regulations included in the California Building Standards Code, including the California Building Code (CBC), California Wildland Urban Interface Code (CWUIC), and California Fire Code (CFC). These regulations specifically address construction within VHFHSZs and require fire-hardened construction to prevent ignitions, allow evacuation, and slow the spread of wildfire.

3.8.2.3 Regional

San Diego County Department of Environmental Health and Quality/Hazardous Materials Division

The County Department of Environment Health and Quality is the designated Certified Unified Program Agency for San Diego County and is responsible for regulating all uses within the County that handle, store, generate, or treat hazardous wastes and materials. The Hazardous Materials Division provides oversight, permitting, and compliance monitoring for several programs, including those related to HMBPs, the Hazardous Waste Generator Program, Underground Storage Tanks, the Aboveground Petroleum Storage Act, the California Accidental Release Prevention Program, and hazardous materials release response plans and inventories. Projects that would encounter or use hazardous materials are required by law to develop applicable HMBPs, obtain and maintain a valid Unified Program Facility Permit, and submit their facility information electronically to the California Environmental Reporting System.

San Diego County Emergency Operations Plan

The San Diego County Emergency Operations Plan is a comprehensive emergency management system that provides for a planned response to natural disaster situations, technological incidents, and nuclear defense operations (County 2022). The Emergency Operations Plan includes operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the County's population. The Emergency Operations Plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector. Refer to Section 3.16.2.2 for additional discussion of this plan relative to potential wildfire hazards.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The San Diego County Multi-Jurisdictional Hazard Mitigation Plan was prepared to meet federal and state requirements for disaster preparedness that make the County eligible for funding and technical assistance from state and federal hazard mitigation programs. The plan includes a risk assessment to enable local jurisdictions to identify and prioritize appropriate mitigation actions that will reduce losses from potential hazards, including flooding, earthquakes, fires, and humanmade hazards. To address potential hazards, the plan then incorporates mitigation goals and objectives, mitigation actions and priorities, an implementation plan, and documentation of the mitigation planning process for each of the twenty-one participating jurisdictions, including the City of San Diego (County 2023). Refer to Section 3.16.2.2 for additional discussion of this plan relative to potential wildfire hazards.

Airport Land Use Compatibility Plans

The SDCRAA serves as the ALUC for San Diego County and is responsible for adopting ALUCPs for 16 public use and military airports in the County. The ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport. An ALUCP contains policies and criteria that address compatibility between airports and the future land uses that surround them in the areas of noise, overflight, safety, and airspace protection. The project site occurs within the AIA for MCAS Miramar, SDIA and MYF. Refer to Section 3.10.2.3 for further details regarding ALUCP policies.

3.8.2.4 District

Design Guidelines and Standards Manual

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications related to hazardous materials are anticipated to apply to the project.

Removal and Disposal of Hazardous Materials

The general conditions related to removal and disposal of hazardous materials require that hazardous materials, including asbestos, lead, or polychlorinated biphenyls, are managed safely and in compliance with federal, state, and local regulations related to these materials. Before construction begins, a hazardous materials survey must be conducted to identify materials that require specialized handling. If hazardous materials are present, a contractor licensed for abatement and removal activities must be employed to conduct such activities. During construction, the general specifications require containment zones to be established and all construction personnel to be trained and provided appropriate personal protective equipment. Waste manifests must document the proper transportation and disposal of hazardous materials. Once removal activities are complete, air and surface clearance testing is required to confirm the area is free of contamination.

Board Policies and Administrative Procedures

Board Policies 3505 (Emergency Response Plan) and 7415 (Fire, Earthquake, and Disaster Safety) direct the Chancellor to establish procedures that ensure that the District implements a plan to be activated in the event of an emergency or the occurrence of a natural disaster or hazardous condition. This plan must comply with the National Incident Management System, the Standardized Emergency Management System, and should incorporate the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, and other relevant programs. The plan must also identify training requirements for District employees depending on their assigned roles within the emergency plan.

The communications requirement of this Board Policy is implemented by Administrative Procedure 7415.2 (Emergency Communications), which establishes specific procedures to ensure dissemination of

information to students, employees, and the community in a consistent and effective manner in the event of an emergency. The Emergency Communications Response Plan defines what qualifies as an emergency, identifies who is responsible for initiating notifications, and specifies the communication systems that may be used, such as mass-notification platforms capable of delivering calls, texts, and emails. Following an emergency, the District Chancellor and/or President would reconvene the emergency team and review the process and situational response for continuous improvement of the District's emergency response.

Board Policy 6800 (Occupational Health and Safety) authorizes the District Chancellor to create and implement an Occupational Health and Safety Program. The program consists of appropriate policies, programs, and procedures to:

- Identify and evaluate all workplace hazards, including methods to mitigate identified hazards.
- Delegate responsibility for the implementation and enforcement of the District's Injury and Illness Prevention Plan at each of the District's places of operation.
- Train all employees, supervisors, and managers in the recognition of workplace hazards and proper safe work practices.
- Ensure that all employees will comply with safe work practices.
- Create a system of communication between management and employees to promote a safe working environment, including means for employees to inform the District of potential hazards without the fear of retaliation.
- Investigate the causes of accidents and illnesses.
- Correct unsafe or unhealthy conditions or practices in a timely manner.

3.8.2.5 Local

San Diego Municipal Code Hazardous Waste Establishments Regulations

The San Diego Municipal Code Hazardous Waste Establishments regulations (Chapter 4, Article 2, Division 8) enable the Health Officer to establish a program to monitor establishments where hazardous wastes are produced, stored, handled, disposed of, treated, or recycled, and to provide health care information and other appropriate technical assistance on a 24-hour basis to emergency responders in the event of a hazardous waste incident involving community exposure. The Disclosure of Hazardous Materials regulations (Chapter 4, Article 2, Division 9) establishes a system for the provision of information on potential hazards or hazardous materials in the community, including appropriate education and training.

San Diego Municipal Code Public Right-of-Way

Chapter 6, Article 2, Division 12 of the San Diego Municipal Code governs excavation in the public right-of-way (ROW) within the City and establishes that traffic control is required for any project that encroaches into the public ROW. This includes public improvement projects, construction activities, and all other work occurring within City ROW areas such as sidewalks, streets, alleys, medians, and parking spaces. The intent of this section is to ensure public safety, maintain traffic flow, and coordinate temporary disruptions to the transportation network. Obtaining a Public Right-of-Way Permit requires

submittal of a Traffic Control Plan meeting California Manual on Uniform Traffic Control Devices and City standards as a condition of permit approval.

3.8.3 Thresholds of Significance

Thresholds used to evaluate potential hazards and hazardous materials impacts are based on CEQA Guidelines Appendix G. A significant impact related to hazards or hazardous materials could occur if implementation of the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

2. 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;

3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

4. 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, create a significant hazard to the public or the environment;

5. 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, result in a safety hazard or excessive noise for people residing or working in the project area;

6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.8.4 Impact Analysis

3.8.4.1 Transport, Use, Disposal of Hazardous Materials

Threshold 1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Discussion

Construction activities associated with the project would involve the routine transport, use, and disposal of hazardous materials, including, but not limited to, fuels, lubricants, solvents, and paint. These materials are typical of construction activity and contractors using such materials during construction would be required to adhere to the proper storage, handling, and disposal requirements in accordance with applicable federal, state, and District regulations. In addition, the location of material storage and construction staging areas for the project would be dictated by a Stormwater Pollution Prevention Plan (SWPPP), which would include additional storage and containment measures such as requiring the

regular maintenance of construction equipment and providing storage criteria for oil, gasoline, and other potential contaminants that are commonly used during construction activities. While these substances could pose a potential health risk to construction workers and to the public during transport, the storage, transport, handling, and disposal of these materials would occur in accordance with applicable federal, state, local, and District regulations. Based on compliance with regulatory requirements, project implementation would not result in a significant hazard to the public or environment through the transport, use, or disposal of construction-related hazardous materials.

Operation of the project would include activities similar to those occurring in the existing condition, requiring similar types and quantities of hazardous materials as those currently used (such as lubricants, fuels, and cleaning materials). Operational hazardous materials at the project site are used for cleaning, maintenance, and classroom activities such as engine testing (fuels, lubricants, etc.). The project would allow for an increased number of class sessions at the project site, which may incrementally increase the quantity of hazardous materials used during normal operation; however, this increase is expected to be small in scale and would not substantially increase quantities of such materials at the project site. The slight increase in the quantities of these materials that are used would not create a significant hazard to the public or the environment, as management of these materials would continue to occur in accordance with applicable federal, state, local, and District regulations. Adherence to all applicable regulations would ensure that the hazardous materials used for the project are properly managed such that no substantial hazards to the public or the environment occur. Therefore, implementation of the project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and **impacts would be less than significant**. No mitigation is required.

3.8.4.2 Accidental Release of Hazardous Materials

Threshold 2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact Discussion

During construction activities, accidental spills of fuels, lubricants, and other equipment-related liquids classified as hazardous materials could occur. However, as discussed above in Section 3.8.4.1, hazardous construction material storage and staging would be managed by the project-specific SWPPP, which would include measures to securely store hazardous materials to avoid accidental spills and establish protocols to follow if a spill occurs. Additionally, existing federal, state, and District standards and regulations are in place for the handling, storage, and transport of these materials; therefore, project construction would not result in reasonably foreseeable upset or accident conditions related to hazardous materials used for construction equipment and processes.

Implementation of the proposed project would involve the demolition of the Miramar Hangar, which was constructed when fewer regulations on building materials were in effect. Federal regulations banned the use of LBPs for residential structures in 1978, which limited the manufacture of LBPs for all structure types. Regulations banning asbestos have continued to evolve as recently as 2024, though the USEPA rule first issued in 1989 (then later remanded) began the phase-out of ACMs in many industries.

Due to the age of the structures proposed for demolition, there is potential for the presence of LBPs or ACMs in these structures and proposed demolition activities could result in the release of LBP and ACMs, if they are present. As detailed in the District Standards and Guidelines Manual (see Section 3.8.2.4 above), a hazardous materials survey is required to identify materials that require specialized handling prior to demolition of a District building. If hazardous materials are identified, the District would employ a contractor licensed for abatement and removal of the identified hazards to manage construction involving these materials as required by USEPA and California Division of Occupational Safety and Health regulations. Demolition and associated waste disposal would also occur in accordance with the applicable regulations for managing hazardous building materials, which would protect construction workers, the general public, and the environment from adverse effects resulting from the release of LBPs or ACMs. As discussed in Section 3.8.1.2 above, soil sampling at the project site did not identify any environmental conditions of concern related to soil contamination. As such, the project would not result in the accidental release of hazardous materials as a result of soil disturbance.

As discussed further in Section 3.8.4.1 above, hazardous materials would be at the project site for cleaning, maintenance, and classroom activities such as engine testing (fuels, lubricants, etc.). The storage and use of hazardous materials would be subject to the applicable regulations to prevent potential accident conditions, including, but not limited to, RCRA; the federal Spill Prevention, Control, and Countermeasure Rule (40 CFR 112); Hazardous Materials Transportation Act; the Emergency Planning Community Right-to-Know Act; CCR Title 24; California Health and Safety Code; Hazardous Waste Control Act; and San Diego County Department of Environmental Health permitting and program requirements. For small incidental spills, the instructor or other employee responsible can handle the spill only if appropriately trained and equipped. In the event of an accidental release emergency that cannot be readily contained, procedures are set in place for District properties for contacting District Police to initiate the Emergency Response Plan if deemed appropriate and conducting evacuation and/or coordination with local emergency responders, as necessary. Based on regulatory compliance, project operation would not create a significant hazard to the public or environment through accidental release of hazardous materials and **impacts would be less than significant**. No mitigation is required.

3.8.4.3 Hazards to Schools

Threshold 3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Discussion

As discussed above, the project site is not within 0.25 mile of any schools, with the nearest school located at a distance of approximately 0.3 miles. Construction and operation activities associated with the project would require transportation and use of fuels, lubricants, oils, paints, solvents, and other standard hazardous materials. These materials are not acutely hazardous. In addition, the hazardous substances used during construction and operations would be required to comply with existing federal, state, and local regulations regarding the use and disposal of these materials including, but not limited to, RCRA; the federal Spill Prevention, Control, and Countermeasure Rule (40 CFR 112); Hazardous Materials Transportation Act; the Emergency Planning Community Right-to-Know Act; CCR Title 24; California Health and Safety Code; Hazardous Waste Control Act; and San Diego County Department of Environmental Health permitting and program requirements. Additionally, the use of these materials are already occurring as part of ongoing operations at the project site and surrounding properties as part of ongoing use at MYF. Operation of the project would include activities that are occurring in the existing

condition, requiring similar types and quantities of such materials. The project would allow for an increased number of class sessions at the project site, which may incrementally increase the amount of hazardous materials (lubricants, fuels, etc.) used during normal operation; however, this increase is expected to be small and wouldn't substantially increase quantities of such materials at the project site. Therefore, construction and operation of the proposed project would not introduce new hazardous materials or significantly increase the quantities of such materials near local schools.

In addition, as discussed in Section 3.2, *Air Quality,* construction of the proposed project would not expose sensitive receptors to substantial concentrations of diesel particulate matter or other toxic air contaminants. Long-term operation of the project would not represent a substantial source of toxic air contaminants, and the nearest sensitive receptor is located farther than the California Air Resources Board's (CARB's) 1,000-foot recommended siting distance from the project site. The project would not result in significant impacts associated with the emission or handling of hazardous or acutely hazardous materials, substances, or water within one-quarter mile of a school. Impacts would be **less than significant**. No mitigation is required.

3.8.4.4 Listed Hazardous Materials Sites

Threshold 4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact Discussion

As described in Section 3.8.1.2, a search of hazardous materials site databases and a Hazardous Materials Technical Study for the airport property identified cleanup program sites and LUST sites within the project vicinity; however, each of these cases has been closed, except for the one associated with BioFuels 76 site, which is located approximately 600 feet west of the project site (refer to Figure 3.8-1) and is the subject of ongoing regulatory compliance. Given that the BioFuels 76 site is conducting monitoring and reporting associated with regulatory compliance, it would not be expected to pose a limitation to the use of the project site as proposed. Although the airport property has records in the database, the specific location where the project is proposed would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Impacts would be **less than significant**. No mitigation is required.

3.8.4.5 Airport Hazards

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact Discussion

ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport. Because the project site is located on airport property, the guidance for land use compatibility for properties surrounding the airport is not applicable to the project. ALUCPs only apply to land outside airport boundaries and do not govern aircraft in flight or airport ground operations, master planning, or potential expansion. The project site is located within

the AIA for MYF, Review Area 1, and Safety Zone 2 but outside of the existing noise exposure contours for MYF (SDCRAA 2010).

Safety zones are established for the purpose of evaluating the safety compatibility of land use actions in the AIA of the airport. The project site is located within Safety Zone 2 of MYF, which is the Inner Approach/Departure Zone. While colleges and universities are considered "incompatible" in Safety Zones 1, 2, and 5, the proposed facility is the modernization of an existing airport-based aviation maintenance instructional facility at the same location on the MYF property and is not a separate college or university campus. Non-residential development criteria in the ALUCP, which applies to most proposed non-residential development, except uses where additional or different criteria apply (identified in Section 3.4.5 of the ALUCP) identify a maximum acceptable intensity of people within different safety zones, based on intensity per gross acre. None of the criteria identified in Section 3.4.5 of the ALUCP would be applicable to the project, so the maximum acceptable intensity for nonresidential development is applicable to the project. Within Safety Zone 2, the maximum acceptable intensity is 70 people per acre. Based on average class sizes of 23 people, and including proposed staff and/or instructors, two classes could simultaneously occur on the 1.06-acre site while maintaining an intensity below the identified 70 people per gross acre. As the project would comply with the allowable intensity identified in the ALUCP for Safety Zone 2, the project would not result in an airport-related safety hazard.

According to the noise compatibility criteria in Table III-1 of the ALUCP, adult schools, colleges, and universities (classrooms, offices, and related indoor uses) are conditionally acceptable within the 60-70 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) noise exposure contours; however, building structures must be capable of attenuating exterior noise to the indoor requirement of 45 dBA CNEL (SDCRAA 2010). As discussed in Section 3.11, *Noise*, the proposed building could be exposed to noise levels between 60 and 65 dBA CNEL and would attenuate exterior noise to the applicable indoor requirement in accordance with mitigation measure NOI-3. Therefore, the proposed project would not be inconsistent with the ALUCP requirements related to noise and would not expose people to excessive airport noise. Refer to Section 3.11 for a complete discussion of airport noise impacts.

The project proposes a structure with a height of 32 feet. Federal Aviation Regulations Part 77 outlines standards for identifying structures that could be obstructions to navigable airspace. Federal law requires sponsors of proposed structures or objects (including buildings, antennas, trees, and mobile and temporary objects, such as construction cranes) that exceed 14 CFR Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alteration (Form 7460-1). Criteria related to structure height include any structure that exceeds 200 feet in height or structures that penetrate the imaginary surfaces stretching outward and upward from an airport, which is a function of runway length, slope, and horizontal distance. The proposed 32-foot structure is 3 feet and 6 inches taller than the existing structure and is not expected to pose a hazard to air navigation; however, the project's compliance with Part 77 notification requirements, including the submittal of a Notice of Proposed Construction or Alteration (Form 7460-1) would ensure review and approval of the proposed uses from the FAA. FAA review and approval would ensure that no obstructions to navigable air space or associated safety impacts would occur.

The project includes the installation of a modular wetland system and underground vault at the project site. The project stormwater design uses a manufactured underground modular wetland system as a stormwater treatment BMP, integrated with an underground vault BMP, low-flow sump pump, outlet control structure, and storm drain conveyance. It is not intended to function as an open constructed

wetland, open pond, or surface detention basin. The modular wetland system would collect and convey runoff through inlets, piping, and manufactured treatment/storage components without creating persistent above-ground standing water. This allows the project to address stormwater treatment and LID requirements while minimizing bird, wildlife, and vector attractant potential within the airport environment. The project would be required to comply with Airspace Protection Combability Policy 3.5.6 of the MYF ALUCP, which states that land uses that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft in flight or taking off or landing at the airport would only be allowed in the AIA if the uses are consistent with FAA rules and regulations. Specific characteristics to be avoided, as pertaining to wildlife hazards, include proposed uses that create an increased attraction for wildlife and that are inconsistent with FAA rules and regulations. Landfills and certain recreational or agricultural uses that attract large flocks of birds which pose bird strike hazards to aircraft in flight are identified as uses of particular concern. The project does not include landfill, agricultural, or recreational uses. Additionally, landscaping can attract hazardous wildlife. According to FAA Circular 150/5200-33B, the FAA recommends approaching landscaping with caution and confining it to airport areas not associated with aircraft movements. Therefore, the project does not propose the installation of any landscaping on the project site.

The project site is located within the Overflight Area Boundary for SDIA, but is not located within any safety or noise compatibility zones associated with SDIA. In addition, the project site is not located within safety zones, the 60 dB CNEL noise contour, or overflight zones associated with MCAS Miramar. Thus, the project would not be exposed to safety hazards or excessive noise associated with SDIA or MCAS Miramar.

Implementation of the project would not change the use of the project site or any other land uses occurring at MYF that would result in new safety hazards for people residing or working within the AIA, outside of the airport property. The project would continue the existing use of the project site, with an updated, larger building and associated site improvements. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be **less than significant**. No mitigation is required.

3.8.4.6 Emergency Response and Evacuation Plans

Threshold 6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Discussion

The County of San Diego has prepared a Multi-Jurisdictional Hazard Mitigation Plan to address hazards that threaten the County (including the City), determine likely impacts, and set mitigation goals and strategies for emergencies such as dam failures, floods, earthquakes, drought, liquefaction, landslides, wildfires, and other severe weather events. The project would not prevent the ability of the County or City to implement the risk mitigation measures identified in the Multi-Jurisdictional Hazard Mitigation Plan. The evacuation routes in the project vicinity identified the Emergency Operations Plan include I-15, SR 52, SR 163, and I-805 and local evacuation roads identified by the County include Kearny Villa Road and Aero Drive. Construction of the project would not impact any of the identified Interstate or State Routes. During construction activities, the project would require work within the City right-of-way (ROW) involving the construction of connections to existing City-owned utility lines located in Kearny Villa Road to the west of the project site, including water and fire water. For this work within the City

ROW, the District would be required to obtain and comply with the condition of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan in accordance with City policies to ensure emergency access is maintained on City streets. Therefore, during construction, the project would not impair emergency response or evacuation plans.

Once operational, the project would not result in any impacts associated with emergency response or evacuation. The District has developed its Emergency Communications Response Plan (Administrative Procedure 7415.2), which implements Board Policy 7415, Fire, Earthquake and Disaster Safety, to ensure dissemination of information to students, employees, and the community in a consistent and effective manner in the event of an emergency. As discussed further in Section 3.12, *Public Services*, emergency response to the project site would involve the SDFD and/or District Police Department, depending on the nature of the emergency. Although the project would involve the expansion of the instructional space on the site and the lease area, the project site is within an area that is previously served by the SDFD and the District Police Department. The project would have an evacuation plan in accordance with criteria outlined in the District Design Guidelines and Standards Manual and would be incorporated into the overall evacuation zone framework established for the Miramar College campus. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**. No mitigation is required.

3.8.4.7 Wildland Fires

Threshold 7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Discussion

Wildland fire impacts are discussed in detail in Section 3.16, *Wildfire*. As previously discussed, a portion of the project site is within a City-designated VHFHSZ. The project would be constructed in accordance with applicable regulations intended to protect occupants and buildings from fire events. At the state level, this would include compliance with the California Building Standards Code, which requires the use of ignition-resistant materials, the installation of automatic fire sprinkler and alarm systems, defensible space establishment, and the inclusion of fire access roads. As the project site is partially located within a VHFHSZ, adherence to the CWUIC would be required. At the District level, the project would be required to comply with the fire-related requirements in the District Design Guidelines and Standards Manual, including the development of a project-specific fire accessibility site plan and fire flow data report with approval by the DSA, compliance with CFC requirements for interior finishes, and compliance with the CBC fire access road requirements. Therefore, impacts associated with the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires would be **less than significant**. No mitigation is required.

3.8.5 Cumulative Impact Analysis

Impacts related to hazards and hazardous materials are generally site-specific, as risks associated with hazardous materials, hazardous material sites, and exposure of schools to hazardous materials from the project site generally occur in one location and do not result in risks elsewhere. Therefore, the geographic area for the analysis of cumulative impacts related to hazardous materials, hazardous materials sites, and exposure of schools of hazardous materials from the project site consists of properties within the immediate vicinity (approximately 0.25-mile) of the project site. The geographic

context for the analysis of cumulative impacts related to airport hazards and emergency response and evacuations plans is the County of San Diego. The geographic scope for the wildfire cumulative analysis is the City and surrounding areas. Wildfires are unpredictable and given the right conditions, can spread over large areas. However, for the purposes of this analysis and the required compliance with fire regulations, including state and local requirements, the cumulative analysis considers the local area that would be prone to wildfire.

3.8.5.1 Transport, Use, Disposal of Hazardous Materials

Cumulative development projects would require transportation, use, and disposal of hazardous materials. However, like the proposed project, cumulative projects would be required to comply with all applicable federal, state, and local regulations related to the handling and storage of hazardous materials. Through the proper handling and storage of hazardous materials in accordance with these regulations and/or activity-specific permit conditions, cumulative projects would not result in a hazard to the public or the environment. Therefore, cumulative impacts related to the transport, use, and disposal of hazardous material would be **less than significant**.

3.8.5.2 Accidental Release of Hazardous Materials

Cumulative development projects would require the use and storage of hazardous materials, which carries the potential to result in the accidental release of hazardous materials. Projects associated with the Draft Airport Master Plan (AMP) could potentially occur near or adjacent the project site, with construction activities potentially overlapping. However, like the proposed project, cumulative projects would be required to comply with all applicable federal, state, and local regulations or permit conditions related to the handling and storage of hazardous materials, including the requirements for spill containment and cleanup procedures as well as hazardous building material removal (such as LBP and ACMs). The proper handling and storage of hazardous materials would minimize the potential for accidental spills, while implementation of spill containment and cleanup procedures would prevent significant hazards to the public or the environment in the event of accidental spills. As such, cumulative impacts would be **less than significant**.

3.8.5.3 Hazards to Schools

Cumulative development projects could use or emit hazardous materials and could be located within a quarter mile of schools. However, like the proposed project, cumulative projects would be required to comply with all applicable federal, state, and local regulations related to the handling and storage of hazardous materials, which are intended to protect all populations from these hazards, including students. Through the proper handling and storage of hazardous materials, cumulative projects would not result in a hazard to schools. Therefore, cumulative impacts related to hazards to schools would be **less than significant**.

3.8.5.4 Listed Hazardous Materials Sites

As discussed in Section 3.8.4.4, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Future cumulative projects could be proposed on properties that contain these hazardous sites. However, in these cases, projects would undergo project-level review, potentially including preparation of Phase I and/or Phase II Environmental Site Assessment or similar studies to evaluate the condition of the identified hazard. A cumulative project that proposes development of a potential hazardous materials site would be required to remediate the

existing site contamination consistent with applicable regulations and under the oversight of the applicable regulatory agency prior to occupancy. With adherence to regulations, and the fact that the project itself is not located on a listed hazardous materials site, cumulative impacts resulting from development of hazardous materials sites would be **less than significant.**

3.8.5.5 Airport Hazards

Cumulative projects could be proposed within the AIAs for MYF, MCAS Miramar, and/or SDIA or other airports in the region. Each cumulative project would be required to achieve compliance with the ALUCP compatibility criteria relevant to their respective airport, location within noise or safety contours, and proposed land use type. With adherence to regulations and requirements outlined in ALUCPs, cumulative impacts related to airport hazards would be **less than significant**.

3.8.5.6 Emergency Response and Evacuation Plans

Construction of future cumulative development projects in the City could result in interference with emergency response or evacuation plans during temporary construction activities that block access routes. Such projects would also be required to provide adequate emergency access in accordance with the CFC and CBC. However, no cumulative projects are reasonably anticipated to result in permanent changes to the nearby highways and arterials such that access to existing emergency evacuation routes would be eliminated. Development at the project site would not physically interfere with emergency response or evacuation plans as it does not include features that prevent continued implementation of these plans. However, if construction of future development at the MYF property associated with the Draft AMP occurred at the same time as the proposed project, multiple construction projects within the MYF property may result in temporary access restrictions and potential hindering of emergency response and evacuation plans. The proposed project and future projects within the airport property would be subject to the requirements of the City's ROW Permit for work within public roads, which would include the requirement to prepare a Traffic Control Plan. These requirements would ensure the maintenance of emergency access during construction. Similarly, cumulative development projects within the City would be required to comply with relevant City policies related to circulation under a Traffic Control Plan to ensure that emergency access is maintained during construction. Therefore, cumulative impacts related to emergency response and evacuation plans would be **less than significant**.

3.8.5.7 Wildland Fires

Cumulative development projects could be located within or adjacent to VHFHSZs. Cumulative development projects within the City would be required to adhere to all regulatory requirements in place to minimize wildfire hazards due to construction in these areas, including compliance with the relevant sections of the CFC, CWUIC, and CBC, and establishment of defensible space to prevent the spread of wildfire. While cumulative projects could increase the amount of development in VHFHSZs throughout the City, adherence to the applicable regulatory requirements would reduce potential risks to people and property. Therefore, cumulative impacts related to wildland fire risk would be **less than significant**.

3.9 Hydrology and Water Quality

This section addresses the potential hydrology and water quality impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to hydrology and water quality are also addressed.

3.9.1 Environmental Setting

3.9.1.1 Hydrology

The San Diego region is divided into two hydrologic basins by the northwest-trending Peninsular Range. The San Diego Hydrologic Basin is on the gently sloping western side of the range, and the Colorado River Hydrologic Basin is on the steep eastern side. The San Diego Hydrologic Basin is divided into hydrologic units (HUs), which are entire watersheds made up of one or more rivers or streams. Each HU, or watershed, is divided into hydrologic areas (HAs), which are the major tributaries or major groundwater basins within the watershed. Hydrologic subareas, which include water-bearing and non-water-bearing formations, are major subdivisions of HAs.

The San Diego Hydrologic Basin includes 11 HUs: Carlsbad, San Dieguito, Los Peñasquitos, San Diego, Pueblo San Diego, Sweetwater, Otay, San Luis Rey, San Juan, Santa Margarita, and Tijuana. All 11 of these HUs ultimately drain towards the west into the Pacific Ocean. The project site lies within the Mission San Diego hydrologic subarea of the Lower San Diego hydrological area, which is part of the San Diego River watershed. With a land area of approximately 434 square miles, the San Diego River watershed is home to approximately 520,000 residents and contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee, as well as several unincorporated areas. Approximately 44 percent of the San Diego River watershed is currently undeveloped. Important hydrologic resources in the watershed include five water storage reservoirs, a large groundwater aquifer, extensive riparian habitat, coastal wetlands, and tide pools (Project Clean Water 2019). Murphy Canyon Creek and the Lower San Diego River are within this watershed.

3.9.1.2 Water Quality Conditions

Storm water from the project site turns to runoff, which is then conveyed off site via paved surfaces, gutters, and storm drains. Thus, pollutants in runoff may reach receiving waters. Typical pollutants from existing uses within the project site include sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides.

Point Source Pollutants

The U.S. Environmental Protection Agency (USEPA) defines point source pollution as “any single identifiable source of pollution from which pollutants are discharged, such as a pipe, ditch, ship or factory smokestack.” Factories and sewage treatment plants are two common types of point sources. Factories, including oil refineries, pulp and paper mills, and chemical, electronics and automobile manufacturers, typically discharge one or more pollutants in their discharged waters (called effluents). Some factories discharge their effluents directly into a waterbody, while others treat it themselves before it is released or send their wastes to sewage treatment plants for treatment.

Another way that some factories and sewage treatment plants handle waste material is by mixing it with urban runoff in a combined sewer system. As the runoff crosses urban surfaces, it picks up chemicals and pollutants, and this untreated, polluted water then runs directly into a sewer system. When it rains excessively, a combined sewer system may not be able handle the volume of water, and some of the combined runoff and raw sewage will overflow from the system, discharging directly into the nearest waterbody without being treated. This combined sewer overflow is considered point source pollution and can cause severe damage to human health and the environment. Unregulated discharges from point sources can result in water pollution and unsafe drinking water, and can restrict activities like fishing and swimming.

To control point source discharges, the Clean Water Act (CWA) established the National Pollutant Discharge Elimination System (NPDES). Under the NPDES program, factories, sewage treatment plants, and other point sources must obtain a permit from the state and USEPA before they can discharge their waste or effluents into any body of water. Prior to discharge, the point source must use the latest technologies available to treat its effluents and reduce the level of pollutants. If necessary, a second, more stringent set of controls can be placed on a point source to protect a specific waterbody (National Oceanic and Atmospheric Administration [NOAA] 2026). Refer to Section 3.9.2.1 below for additional information.

Nonpoint Source Pollutants

Nonpoint source pollution is pollution that originates from diffuse sources rather than a single point of discharge. It is typically generated when rainfall or snowmelt moves over and through the ground and picks up and carries away natural and human-made pollutants, ultimately depositing them into lakes, rivers, wetlands, coastal waters, and groundwater. Common nonpoint source pollutants can include: fertilizers, herbicides, and insecticides from agricultural lands and residential areas; oil, grease, and toxic chemicals from urban runoff and energy production; sediment from improperly managed construction sites, crop and forest lands, and eroding streambanks; salt from irrigation practices and acid drainage from abandoned mines; bacteria and nutrients from livestock, pet wastes, and faulty septic systems; and atmospheric deposition and hydromodification. Urbanization can increase the generation and transport of nonpoint source pollutants relative to natural conditions, thereby affecting the water quality of adjacent streams and downstream receiving waters. Accordingly, an important consideration in evaluating stormwater quality is to assess whether nonpoint source pollutants would impair the beneficial uses of receiving waters. While receiving waters can assimilate limited quantities of various constituent elements, concentrations that exceed applicable thresholds may degrade water quality and result in adverse environmental effects.

Characteristics of Runoff

Standard parameters, which can assess the quality of stormwater, provide a method of measuring impairment. The quantity of a material in the environment and its characteristics determine the degree of availability as a pollutant in surface runoff. In an urban environment, the quantity of certain pollutants in the environment is a function of the intensity of the land use. For instance, a high density of automobile traffic makes a number of potential pollutants (such as lead and hydrocarbons) more available. The availability of a material, such as a fertilizer, is a function of the quantity and the manner in which it is applied. Applying fertilizer in quantities that exceed plant needs leaves the excess nutrients available for loss to surface runoff or groundwater. Water quality parameters for stormwater comprise a

long list and are classified in many ways. Typically, the concentration of an urban pollutant, rather than the annual load of that pollutant, is required to assess a water quality problem.

3.9.1.3 Receiving Waters

Receiving waters from runoff within the project vicinity include Murphy Canyon Creek, San Diego River, and ultimately the Pacific Ocean. Existing water quality conditions of these receiving waters are described below.

Beneficial Uses

Beneficial uses are the uses of water necessary for the survival or wellbeing of humans, plants, and wildlife. These water uses serve to promote the tangible and intangible economic, social, and environmental goals of humankind. The Water Quality Control Plan for the San Diego Basin (Basin Plan) prepared by the RWQCB identifies beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground waters.

Murphy Canyon Creek

Existing beneficial uses identified for Murphy Canyon Creek include Agricultural Supply, Industrial Service Supply, Contact Water Recreation, Non-contact Water Recreation, Warm Freshwater Habitat, Wildlife Habitat, and Rare, Threatened, or Endangered Species. Murphy Canyon Creek is excluded from the Municipal and Domestic Supply beneficial use.

San Diego River

Existing beneficial uses identified for the San Diego River include Agricultural Supply, Industrial Service Supply, Contact Water Recreation, Non-contact Water Recreation, Warm Freshwater Habitat, Wildlife Habitat, and Rare, Threatened, or Endangered Species. The San Diego River is excluded from the Municipal and Domestic Supply beneficial use.

Pacific Ocean

Existing beneficial uses identified for Pacific Ocean include Industrial Service Supply, Navigation, Contact Water Recreation, Non-contact Water Recreation, Commercial and Sport Fishing, Preservation of Biological Habitats of Special Significance, Wildlife Habitat, Rare, Threatened, or Endangered Species, Marine Habitat, Aquaculture, Migration of Aquatic Organisms, Spawning, Reproduction, and/or Early Development, and Shellfish Harvesting.

Clean Water Act Section 303(d) Impaired Water Bodies and Total Maximum Daily Loads

Under Section 303(d) of the CWA, states, territories and authorized tribes are required to develop a list of water quality limited segments. Waters on the list do not meet water quality standards even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires the establishment of priority rankings for water on the lists and development of action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego region.

One receiving water for the project site, the San Diego River (Lower), is currently listed as impaired (based on the 2014 – 2016 303[d] List). The pollutants/stressors causing impairment of the San Diego River (Lower) are benthic community effects, cadmium, indicator bacteria, nitrogen, oxygen (dissolved), phosphorus, total dissolved solids, and toxicity. There are three adopted TMDLs that are being implemented for the San Diego River (Lower) for bacteria and coliform.

3.9.1.4 Groundwater and Regional Groundwater Quality

Groundwater is defined as subsurface water that occurs beneath the water table in soils and geologic formations that are fully saturated. Groundwater bearing formations sufficiently permeable to transmit and yield substantial quantities of water are called aquifers. A groundwater basin is defined as a hydrogeologic unit containing one large aquifer or several connected and interrelated aquifers. The principal groundwater basins in the San Diego region are relatively small in area and usually shallow. Although these groundwater basins are limited in size, the groundwater yield from the basins has been historically important to the development of the region. Nearly all of the local groundwater basins have been intensively developed for municipal and agricultural supply purposes. Groundwater within the Mission San Diego hydrologic subarea of the Lower San Diego hydrological area of the San Diego hydrologic unit has identified existing beneficial uses of Agricultural Supply, Industrial Service Supply, and Industrial Process Supply. Municipal and Domestic Supply is a potential beneficial use.

Groundwater was not encountered at the project site to the maximum explored depth of approximately 20 feet below ground surface (UES 2026). The project site is not located within a designated groundwater basin. The nearest mapped groundwater basin to project site is the Mission Valley Groundwater Basin (9-014), which is located approximately 2.5 miles south of the project site, near the San Diego River. This groundwater basin is a Very Low Priority Basin and is not designated as a critically overdrafted basin or adjudicated area by the California Department of Water Resources (DWR; 2020). Pursuant to the Sustainable Groundwater Management Act, groundwater sustainability plans to manage long-term sustainability of groundwater are not required for Very Low Priority Basins. In addition, groundwater use in the County of San Diego (County) is limited due to low recharge from sparse rainfall and comprises a very small portion (approximately seven percent) of the San Diego region's water supply portfolio (San Diego County Water Authority [SDCWA] 2026).

3.9.1.5 Floodplain Mapping

Based on mapping from the Federal Emergency Management Agency (FEMA), the project site is within Zone X, which is an area determined to exhibit minimal flood hazards. The nearest floodplain is associated with Murray Canyon Creek situated approximately 0.3 mile to the southwest (south of Aero Drive) and an area to the east of Murphy Canyon Road associated with Murphy Canyon Creek, approximately 2 miles east of the project site (FEMA 2026).

3.9.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to hydrology and water is provided below.

3.9.2.1 Federal

Clean Water Act

The principal law governing pollution of the nation's surface waters is the Federal Water Pollution Control Act (i.e., the CWA). Originally enacted in 1948, it was amended in 1972 and has remained substantially the same since. The CWA consists of two major parts: provisions that authorize federal financial assistance for municipal sewage treatment plant construction and regulatory requirements that apply to industrial and municipal dischargers. The CWA authorizes the establishment of effluent standards on an industry basis. The CWA also requires states to adopt water quality standards that "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the NPDES, effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. The USEPA has delegated the responsibility for the administration of portions of the CWA to state and regional agencies.

Impaired Water Bodies

CWA Section 303(d) and California's Porter-Cologne Water Quality Control Act (described below) require that the state establish the beneficial uses of its state waters and adopt water quality standards to protect those beneficial uses. Section 303(d) establishes a TMDL, which is the maximum quantity of a contaminant that a water body can maintain without experiencing adverse effects, to guide the application of state water quality standards. Section 303(d) also requires the state to identify "impaired" streams (water bodies affected by the presence of pollutants or contaminants) and to establish the TMDL for each stream.

National Pollutant Discharge Elimination System

To achieve its objectives, the CWA is based on the concept that all discharges into the nation's waters are unlawful, unless specifically authorized by a permit. The NPDES is the permitting program for the discharge of pollutants into surface waters of the U.S. under CWA Section 402. Thus, industrial and municipal dischargers (point source discharges) must obtain NPDES permits from the appropriate RWQCB (i.e., the San Diego RWQCB in the project region). The existing NPDES (Phase I) stormwater program requires municipalities serving more than 1,000,000 persons to obtain an NPDES stormwater permit for any construction project larger than five acres. Proposed NPDES stormwater regulations (Phase II) expand this existing national program to smaller municipalities with populations of 10,000 persons or more and construction sites that disturb more than one acre. For other dischargers, such as those affecting groundwater or from non-point sources, a Report of Waste Discharge must be filed with the RWQCB. For specified situations, some permits may be waived, and some discharge activities may be included in an existing General Permit.

National Flood Insurance Program

Congress passed the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, which are intended to reduce the need for large, publicly-funded flood control structures and disaster relief by restricting development on floodplains.

The National Flood Insurance Program (NFIP) provides a means for property owners to financially protect themselves from flood damage. The NFIP offers flood insurance to homeowners, renters, and business owners if their community participates in the program. Participating communities agree to adopt and enforce ordinances that meet or exceed FEMA requirements to reduce the risk of flooding. The City of San Diego (City) is a participant and must adhere to the NFIP. The District is not a separate participant in the NFIP but may obtain flood insurance and rely on maps prepared to identify flood hazards in the City.

Through its Flood Hazard Mapping Program, FEMA identifies flood hazards, assesses flood risks, and partners with states and communities to provide accurate flood hazard and risk data. Flood hazard mapping is an important part of the NFIP, as it is the basis of the NFIP regulations and flood insurance requirements. FEMA maintains and updates data through FIRMs and risk assessments. A FIRM is an official map of a community on which FEMA has delineated both the special hazard areas and the risk premium zones applicable to the community.

A Special Flood Hazard Area is an area within a floodplain having a one percent or greater chance of flood occurrence within any given year (commonly referred to as the 100-year flood zone). Special Flood Hazard Areas are delineated on flood hazard boundary maps issued by FEMA. The Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 1994 make flood insurance mandatory for most properties in Special Flood Hazard Areas.

3.9.2.2 State

Porter-Cologne Water Quality Control Act

The CWA places the primary responsibility for the control of surface water pollution and for planning the development and use of water resources with the states, although it establishes certain guidelines for states to follow in developing their programs and allows the USEPA to withdraw control from states with inadequate implementation mechanisms.

California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act (California Water Code Section 13000, et seq.). The Porter-Cologne Water Quality Control Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Water Quality Control Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or

types of waste. The San Diego RWQCB has adopted the San Diego Basin Plan, which is the applicable water quality control plan for the San Diego region and is discussed further in Section 3.9.2.3 below.

California Toxics Rule

The California Toxics Rule is a federal regulation issued by the USEPA providing water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in California. California Toxics Rule criteria are applicable to the receiving water body and therefore must be calculated based on the probable hardness values of the receiving waters for evaluation of acute (and chronic) toxicity criteria. At higher hardness values for the receiving water, copper, lead, and zinc are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

State Water Resources Control Board

The SWRCB administers water rights, water pollution control, and water quality functions throughout the state, while the RWQCBs conduct planning, permitting, and enforcement activities. Construction permitting is administered by the SWRCB, while post-construction permitting is administered by the RWQCB. In California, NPDES permits are also referred to as waste discharge requirements that regulate discharges to waters of the U.S.

Construction General Permit

On November 16, 1990, the USEPA published final regulations that established stormwater permit application requirements for specified categories of industries. The regulations provide that discharges of stormwater to waters of the U.S. from construction projects are effectively prohibited unless the discharge complies with an NPDES Permit. On September 8, 2022, the SWRCB reissued the Construction Stormwater General Permit (Water Quality Order 2022-0057-DWQ).

Projects that disturb one or more acres of soil or are part of a larger common plan that, in total, disturbs one or more acres, are required to obtain coverage under the Construction General Permit. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore a facility's original line, grade, or capacity. To obtain coverage under the Construction General Permit, Permit Registration Documents, including a Notice of Intent, Risk Assessment, Site Map, and Stormwater Pollution Prevention Plan (SWPPP), among others, must be filed with the SWRCB prior to the commencement of construction activity. The Notice of Intent notifies the SWRCB of the applicant's intent to comply with the Construction General Permit, and the SWPPP includes a list of Best Management Practices (BMPs) that would be used to protect stormwater runoff from pollutant discharge during construction. Additionally, the project's SWPPP must contain a visual monitoring program and a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs.

Municipal Separate Storm Sewer System Permit

The Municipal Separate Storm Sewer System (MS4) Permit is a regulatory program under the federal CWA and California's Porter-Cologne Water Quality Control Act that requires cities, counties, and other permitted agencies to reduce pollutants in stormwater runoff to the maximum extent practicable. The permit mandates a comprehensive stormwater management program that includes public education,

construction and post-construction stormwater controls, illicit-discharge detection and elimination, watershed-based planning, and monitoring to ensure compliance with water-quality standards. MS4 permittees must implement BMPs, enforce stormwater ordinances, and integrate low-impact development (LID) strategies to reduce runoff volume and pollutant loads.

The MS4 Phase I regulation requires medium and large cities or certain counties with populations of 100,000 or more individuals to obtain NPDES permit coverage for their stormwater discharges. The San Diego RWQCB regulates discharges from Phase I MS4s under the Regional MS4 Permit, which covers 39 municipal, county, and special district entities within its jurisdiction, including the City of San Diego.

The MS4 Phase II regulation extends NPDES permit coverage to smaller MS4s in urban areas with a population of more than 50,000 people as well as non-traditional MS4s associated with uses such as public universities, departments of transportation, hospitals, or prisons. Many Phase II MS4s are covered by statewide General Permits, though some states issue individual permits. In California, the SWRCB has adopted a general Statewide Small MS4 Permit under which special entities may enroll. The District is not currently an enrolled entity under Order No. 2013-0001-DWQ (RWQCB 2026) but intends to comply with the NPDES regulations through the MS4 Phase II program (refer to Section 3.9.2.4 below).

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) established a framework for sustainable, local groundwater management in 2014. The SGMA requires groundwater-dependent regions to halt overdraft and bring basins into balanced levels of pumping and recharge. With the passage of the SGMA, the DWR launched the Sustainable Groundwater Management Program to implement the law and provide ongoing support to local agencies around the state. The SGMA requires local agencies to form groundwater sustainability agencies for high and medium priority basins and to implement groundwater sustainability plans within 20 years. The DWR maintains the online SGMA Basin Prioritization Dashboard, which identifies the priority of the groundwater basins in California on a scale of Very Low to High based on a point system that considers factors including population, available wells, irrigated acres, and groundwater resilience. Groundwater basins with more than 14 points are considered Medium or High Priority, while basins with 14 or less points are considered Low or Very Low Priority.

3.9.2.3 Regional

Water Quality Control Plan for the San Diego Basin

The Basin Plan, originally adopted in 1994 by the RWQCB with amendments effective on or before September 2021 (RWQCB 2021), sets forth water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. The Basin Plan contains the water quality objectives, policies, regulations, and implementation programs for the protection of surface and ground waters within the San Diego Region. The Basin Plan describes the beneficial uses that each water body supports and are the basis for San Diego RWQCB regulatory actions. The Basin Plan incorporates by reference all applicable SWRCB and RWQCB plans and policies. Specifically, the Basin Plan is designed to accomplish the following:

- Designate beneficial uses for surface water and groundwater;
- Set the narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy;

- Describe implementation programs to protect the beneficial uses of all waters within the region; and
- Describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

Water Quality Improvement Plan for the San Diego River Watershed Management Area

The Water Quality Improvement Plan (WQIP) for the San Diego River Watershed Management Area is a document developed under the framework of the San Diego Regional Municipal Stormwater Permit and the federal CWA. It delineates a watershed-based strategy to reduce pollutant loading and improve beneficial uses within four hydrologically distinct HAs: Lower San Diego, San Vicente, El Capitan, and Boulder Creek. The plan identifies priority water quality conditions, primarily pathogen indicators, and establishes numeric goals and load reduction benchmarks based on TMDL allocations and receiving water limitations. The WQIP identifies BMPs such as LID strategies, hydromodification controls, and structural treatment systems to mitigate urban runoff. The WQIP integrates monitoring, data analysis, and performance assessment to refine strategies over time.

3.9.2.4 District

District Design Guidelines and Standards Manual

Design Guides and Standards

Section 2.1, *Design Guides and Standards*, of the District Design Guidelines and Standards Manual includes guidelines for the design of facilities on the District campuses. The following guidelines in this section are related to hydrology and water quality.

Project Programming

The Project Programming section requires the integration of LID concepts where possible into landscaped areas and site improvements to manage stormwater runoff as a resource. Specific implementation techniques include the following:

- Utilize site design measures to reduce, or replicate, pre-construction water balance.
- Conserve natural area, soils, and vegetation and minimize disturbances to natural drainage areas.
- Incorporate landscape designs that promote water retention and evaporation.
- Maximize the percentage of pervious surfaces for low traffic areas, parking lots, trails, and pedestrian walkways to allow percolation of stormwater into the ground.
- Minimize directly connected impervious areas by directing roof, parking lot, and surface flows to pervious/vegetated areas.

Stormwater Management Requirements

As outlined in this section, the District has elected to comply with the requirements of the NPDES General Permit for Waste Discharge Requirements for Stormwater Discharge From Small MS4s (Order No. 2013-0001-DWQ, as amended). The engineer of record is required to determine if a project is subject to the Phase II Small MS4 permit requirements. In addition, a Preliminary Water Quality

Technical Report (WQTR) shall be submitted to the District for review and comment at the 50 percent Construction Document Submittal milestone, and the Final WQTR shall be submitted to the District for review and comment at the Division of the State Architect (DSA) Submittal milestone. This section further specifies that the District is responsible for the installation, verification, ongoing implementation, and maintenance of permanent post-construction stormwater management measures (also known as BMPs).

This section additionally specifies that some portions of District projects may be conducted in the City Right-of-Way (ROW), and that these portions of the project may be required to provide the following documents to the City: (1) City of San Diego Storm Water Requirements Applicability Checklist; (2) City of San Diego Standard Project Storm Water Quality Management Plan (SWQMP) forms; and (3) City of San Diego Priority Development Project SWQMP.

Storm Water Pollution Prevention Plan

This section of the District Design Guidelines and Standards Manual outlines specific requirements for the preparation of Water Pollution Control Plans (WPCPs) and SWPPPs for projects on District properties which are dependent on the size of the project disturbance area. For projects disturbing less than one acre, a WPCP must be developed to manage sediment, materials, waste, and other pollutants in stormwater. Projects disturbing one acre, or more, of soil are subject to the NPDES General Permit For Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ NPDES No. CAS000002; Construction General Permit). In addition, a SWPPP must be developed to meet Construction General Permit requirements based on the individual project's risk level. SWPPPs prepared for District projects must be:

- Prepared by a Qualified SWPPP Developer.
- Aligned with the District SWPPP template for the project size.
- Tailored to site-specific conditions, including the selection of appropriate BMPs for each construction phase.
- Submitted at DSA Submittal and finalized prior to bid.

This section additionally states that the project contractor should ensure permit coverage is feasible from a construction management perspective and fully compliant with Construction General Permit requirements. In addition, Water Pollution Control Drawings must be prepared for each phase of construction, which are generally considered to be demolition, grading, land development and utilities, streets and vertical, landscaping and final stabilization. Each Water Pollution Control Drawing must be prepared as an individual exhibit.

In addition, during the conceptual phase, a preliminary water balance calculation must be conducted to assess the need for post-construction BMPs in accordance with the District's WQTR template for the Water Balance Calculator. Post-construction BMP types and locations must be refined during design development and construction drawing preparation to account for actual site conditions, and must be done in compliance with the Phase II MS4 permit. The selection, siting, sizing, and operation and maintenance requirements of the post-construction BMPs should be documented in a project-specific WQTR.

3.9.2.5 Local

City of San Diego Stormwater Standards

The Stormwater Standards are a portion of the City's Land Development Manual that provides information to project applicants on how to comply with the permanent and construction stormwater quality requirements of the City. The Stormwater Standards provide minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and minimum performance standards, including the following: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and natural hydraulic features and riparian buffers preserved where possible. Although the footprint of the LID BMPs can often fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features. The City's current Stormwater Standards are consistent with the Regional Best Management Practices Design Manual and provide controls for development projects consistent with the City's MS4 permits.

The Stormwater Standards also address "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in stormwater runoff discharge rates and durations. Future development projects proposed within areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Exemptions from hydromodification management requirements shall adhere to the current City's Stormwater Standards. Projects discharging into underground storm drains discharging directly to bays or the ocean are also exempt, subject to conditions listed in the City's Stormwater Standards.

3.9.3 Thresholds of Significance

Thresholds used to evaluate potential hydrology and water quality impacts are based on CEQA Guidelines Appendix G. A significant hydrology and water quality impact could occur if implementation of the proposed project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    a. Result in substantial erosion or siltation on- or off-site;

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

c. 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

d. Impede or redirect flood flows;

4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.4 Impact Analysis

3.9.4.1 Water Quality Standards

Threshold 1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Discussion

Construction

Construction of the proposed project could result in short-term impacts to water quality associated with the handling, storage, and disposal of demolition debris and construction materials; maintenance and operation of construction equipment; and earthmoving activities. These activities could result in the discharge of soil or construction materials and fuels due to stormwater runoff. However, all construction-related activities associated with project would be required to comply with the stormwater management and water pollution control requirements in the District Design Guidelines and Standards Manual, which have been developed in part to reduce the potential for adverse water quality effects associated with construction activities. See Section 3.9.2.4 above for additional details.

As the proposed project would disturb one acre or more, it would be required to prepare and submit a Notice of Intent and a SWPPP to the SWRCB demonstrating compliance with the NPDES Construction General Permit. The Construction General Permit requires that non-stormwater discharges from construction sites be eliminated or reduced to the maximum extent practicable, that a SWPPP be developed governing project construction activities, and that routine inspections of stormwater pollution prevention measures and control practices be performed, including inspections before and after storm events. The specific BMPs required of the proposed project would be determined during the SWPPP preparation process based on site-specific factors but would generally include measures in the categories of site inspection and maintenance, identification of potential pollutant sources, erosion control/soil stabilization, and post-construction BMPs. The project would be required to implement all construction BMPs outlined in the SWPPP to protect downstream water quality and ensure compliance with the Construction General Permit. Upon construction completion, the Construction General Permit permittee for the project would be required to submit a Notice of Termination to the RWQCB to indicate that construction has been completed.

Operation

Implementation of the proposed project would result in minor changes to the amount of impervious surfaces at the project site, due to the larger building footprint and the new paved parking area. These minor changes could indirectly increase the total amount of pollutants in stormwater runoff and non-stormwater runoff traveling to on-site drainages and downstream receiving waters, some of which are identified as impaired for certain constituents as discussed in Section 3.9.1.2. The proposed land uses at the project site would not change and, therefore, would not introduce new types of pollutants.

The project site has been previously developed and contains an existing structure and existing concrete pad for engine testing. The project would result in the construction of an expanded and modernized building, a replacement concrete pad for open-air storage and engine testing, and a new paved area for parking. These changes could slightly alter the drainage patterns at the project site; however, due to the small project site size and the existing development already on site, the proposed project would not substantially increase the amount of pollutant discharge. The District Design Guidelines and Standards Manual requires a preliminary water balance calculation to be conducted to determine the need for post-construction BMPs based on existing and proposed site characteristics. Based on this calculation, the selection, siting, sizing, and operation and maintenance requirements of post-construction BMPs that are determined to be applicable must be documented in a project-specific WQTR. The District is responsible for the installation, verification, ongoing implementation, and maintenance of permanent post-construction BMPs at the project site

Although there is a potential for an increase in pollutants to enter storm drain systems and receiving waters, the project would be required to comply with the Phase II Small MS4 Permit and associated Stormwater Management Program. The project would include the installation of a storm drain along the perimeter of the proposed hangar, which would connect to a modular wetland system and underground vault located near the southwestern corner of the proposed new hangar. In addition, a storm drain would be constructed along the central portion of the parking lot which would connect to a modular wetland system and underground vault located in the western portion of the parking lot. With implementation of the construction and post-construction requirements outlined in the District Design Guidelines and Standards Manual, in addition to compliance with state and regional standards for water quality and waste discharge requirements, implementation of the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **Impacts would be less than significant**. No mitigation is required.

3.9.4.2 Groundwater Supplies and Recharge

Threshold 2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact Discussion

The project site is not located within a designated groundwater basin or recharge area. The project would incorporate LID features that allow infiltration at the project site. Given the small size of the project site, the change in permeable surfaces at the project site would not substantially interfere with groundwater recharge. As such, the project would not result in a substantial decrease in groundwater

recharge or the depletion of groundwater supplies such that the sustainable groundwater management of the basin would be impeded. **Impacts would be less than significant**. No mitigation is required.

3.9.4.3 Drainage Patterns

Threshold 3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows?

Impact Discussion

The proposed project would alter impervious surfaces at the project site. The project site has been previously developed and contains an existing structure and existing concrete pad for engine testing. The project would result in the construction of an expanded and modernized building, a replacement concrete pad for open-air storage and engine testing, and a new paved area for parking. These changes could slightly alter the drainage patterns at the project site; however, due to the small project site size and the existing development already on site, the proposed project would not provide substantial additional sources of polluted runoff. The project would not require mass grading or substantial changes in topography such that off-site drainage patterns would be significantly changed. The project would be required to implement the construction and post-construction requirements outlined in the District Design Guidelines and Standards Manual, which would include preparation of water balance calculations to determine where post-construction BMPs are needed and the appropriate sizing. LID concepts are also required to be integrated into the design of the project to reduce runoff and increase water retention on site. Implementation of these District requirements would ensure that the project does not result in a substantial increase in erosion, siltation, or runoff, or exceed the capacity of existing stormwater drainage systems.

As discussed previously, the project site is not within a 100-year or 500-year flood zone. As the project would implement BMPs to capture, treat, and discharge runoff based on proposed changes in the drainage patterns of the sites, it would not result in substantial erosion, a substantial increase in the rate or amount of surface runoff such that flooding would occur, exceedance of stormwater infrastructure capacity, or flood flow alterations.

Finally, to address a comment received on the NOP (Appendix A) regarding the County of San Diego Vector Control Program, the project would adhere to the District Design Guidelines and Standards Manual, which includes standards that prohibit standing water that could be breeding habitat for mosquitos or other vectors. Exterior Improvement Standards in Division 32 of the District Design Guidelines and Standards Manual identify standing water (ponding) as not acceptable, and the Drainage and Grading Standards in Division 32 also require the provision of a drainage system with inlets and piping where needed to prevent standing water. In addition, FAA Advisory Circular (AC) 150/5200-33, Hazardous Wildlife Attractants on or Near Airports, provides design recommendations for new storm water management facilities so as not to create above-ground standing water. The project stormwater design is intended to comply with the District Design Guidelines and Standards Manual, which prohibits standing water that could create mosquito or vector breeding habitat. The project design would provide

positive drainage, inlets, piping, underground stormwater components, and controlled discharge to ensure that persistent surface ponding does not occur. The design would also be coordinated with FAA Advisory Circular 150/5200-33, Hazardous Wildlife Attractants on or Near Airports, and with the City of San Diego Airport Division so that stormwater facilities do not create bird, wildlife, or vector attractants within the airport environment. Compliance with the District's Design Guidelines and Standards Manual and FAA policies for storm water detention facilities would ensure no standing water that could be breeding habitat for mosquitos or other vectors would occur. **Impacts would be less than significant**. No mitigation is required.

3.9.4.4 Inundation

Threshold 4: Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Discussion

Tsunamis are typically generated by seismic activity, which causes displacement of the ocean floor, resulting in large waves at the coast. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. There are no nearby enclosed bodies of water capable of producing a seiche that would impact the project site. The nearest coastal area to the project site is the Pacific Ocean, located approximately 6.5 miles to the west. The project site is not located within a mapped tsunami hazard area (California Department of Conservation (DOC) 2026). As a result, tsunamis and seiches are not considered a potential hazard to the project site.

As described in Section 3.9.1.5, the project site is mapped within Zone X on FEMA's FIRM for the project area (FEMA 2026). Therefore, the project site is not within a 100-year flood zone or a 500-year flood zone and is not anticipated to be at risk of inundation. The nearest Special Flood Hazard Area to the project site is associated with Murray Canyon Creek situated approximately 0.3 mile to the southwest (south of Aero Drive) of the project site. Further, as described in Section 3.8, *Hazards and Hazardous Materials*, small quantities of hazardous materials may be used on the project site but would be required to be stored in accordance with applicable regulations intended to prevent the accidental release of such materials. Additionally, the District Design Guidelines and Standards Manual requires a preliminary water balance calculation to be conducted to determine the need for post-construction BMPs based on existing and proposed site characteristics. Based on this calculation, the selection, siting, sizing, and operation and maintenance requirements of post-construction BMPs that are determined to be applicable must be documented in a project-specific WQTR. Therefore, in the unlikely event of flooding at the project site, the project would not result in a substantial risk of the release of pollutants based on the lack of flood hazard areas at the project site and the sizing of BMPs to adequately contain flows. **Impacts would be less than significant**. No mitigation is required.

3.9.4.5 Water Quality and Groundwater Management Plans

Threshold 5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Discussion

The water quality control plan applicable to the project site is the Basin Plan described in Section 3.9.2.3 above, which designates beneficial uses and water quality objectives for ground and surface waters in the San Diego region. Compliance with RWQCB permits and objectives through the implementation of a SWPPP and implementation of identified BMPs during operation of the proposed project would ensure that the project does not conflict with or obstruct the implementation of the Basin Plan. In addition, the District Design Guidelines and Standards Manual includes requirements that individual projects would be required to implement during construction and operation to protect water quality and apply LID techniques (refer to Section 3.9.4.1 for additional details). Adherence to these District requirements consistent with SWRCB and RWQCB permit programs would ensure that the proposed project would be consistent with the objectives outlined in the San Diego Basin Plan.

As discussed in Section 3.9.1.4, the project site is not located within a designated groundwater basin and the nearest groundwater basin (Mission Valley Groundwater Basin) is assigned a Very Low Priority Basin. Thus, no sustainable groundwater management plan applies to this basin and the project would not result in conflicts with a sustainable groundwater management plan.

The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management Plan. **Impacts would be less than significant**. No mitigation is required.

3.9.5 Cumulative Impact Analysis

Cumulative impacts would result if modifications to a portion of a watershed or water pollution produced by development were to affect other water bodies in the watershed, as lands and water bodies within a watershed are part of an interrelated hydrologic system. The geographic scope for analysis of cumulative impacts related to hydrology and water quality is the San Diego HU.

3.9.5.1 Water Quality Standards

Cumulative development projects would require conformance with regulatory requirements related to water quality, such as the NPDES Construction General Permit for projects disturbing one or more acres, the City's requirement for preparation of a WPCP for projects disturbing under one acre, and NPDES requirements for implementation of post-construction BMPs. Depending on the uses proposed by cumulative projects, other general permit types issued by the SWRCB or RWQCB may also apply for point source pollutants. Similar to the proposed project, compliance with the applicable state, regional, and local requirements would ensure that projects within the San Diego HU do not violate water quality standards. Therefore, cumulative impacts related to water quality standards would be **less than significant**.

3.9.5.2 Groundwater Supplies and Recharge

The cumulative development projects proposed within the San Diego HU could increase the amount of impervious surface area on their respective project sites and reduce groundwater infiltration. However, similar to the project, cumulative development projects would not be located within a groundwater basin that is designated as medium or high priority and has a sustainable groundwater management plan as there are no groundwater basins within the San Diego HU that are designated as medium or high priority. Therefore, the increase in impervious surface area that could occur is not anticipated to substantially impede groundwater recharge. As such, cumulative impacts related to groundwater supplies and recharge would be **less than significant**.

3.9.5.3 Drainage Patterns

Cumulative development projects could potentially alter the existing drainage patterns at their respective project sites. However, similar to the project, these cumulative development projects would be required to comply with relevant permits and regulations related to stormwater runoff, erosion, siltation, and system capacity implemented by the SWRCB, RWQCB, and City. As such, cumulative impacts to related to the alteration of drainage patterns would be **less than significant**.

3.9.5.4 Inundation

Cumulative development projects could be located in flood hazard, tsunami, or seiche zones and therefore could result in a cumulative increase in the risk of release of pollutants due to inundation. However, tsunamis, seiches, and floods are localized events and cumulative projects would not increase the likelihood of their occurrence or result in increased exposure to these events. In addition, projects that are located within these inundation hazard zones would be required to comply with storage regulations and permit requirements developed for the purpose of reducing the risk of pollutant release. Therefore, cumulative impacts related to the risk of release of pollutants due to cumulative project inundation would be **less than significant**.

3.9.5.5 Water Quality and Groundwater Management Plans

Cumulative development projects would be subject to the goals and policies identified within the Basin Plan, similar to proposed project. There are ten watershed WQIPs in the San Diego Region, which each including descriptions of the highest priority pollutants or conditions in a specific watershed, goals and strategies to address those pollutants or conditions, and time schedules associated with those goals and strategies (RWQCB 2026). Similar to the proposed project, cumulative development projects would be required to comply with these plans, as applicable at the project level, which generally is equivalent to adherence to the regulatory permit programs administered by the SWRCB and RWQCB. As described above, there are no medium or high priority groundwater basins within the San Diego HU and the cumulative development projects would not be subject to a sustainable groundwater management plan. Therefore, cumulative impacts related to water quality and groundwater management plans would be **less than significant**.

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3.10 Land Use and Planning

This section addresses the potential land use and planning impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to land use and planning are also addressed.

3.10.1 Environmental Setting

3.10.1.1 Project Site Land Use

The project site contains the Miramar Hangar on the northwestern portion of the site (refer to Figure 2-2). The Miramar Hangar is an approximately 6,300 SF single-story steel-frame aircraft hangar. A gravel parking lot with a maximum of 40 spaces is located on the southern portion of the site. The eastern portion of the site is comprised of gravel and graded soil which contains various engine testing equipment used by the Aviation Operations Program. A gate and asphalt paved road are located near the southwestern corner of the Miramar Hangar, providing access to the site. The gate and a chain link fence surround the western boundary of the project site which separates Kearny Villa Road from the site. The southern boundary of the project site is delineated by a chain link fence which separates the project site from a disc golf course and a hotel. The northern boundary of the site is open to the hangar associated with Spiders Aircraft Services, Inc., while the eastern boundary of the site is open to the taxiways, open space, and structures associated with Montgomery-Gibbs Executive Airport (MYF). The project site is within the Kearny Mesa Community Plan area with an Institutional land use designation. The City's General Plan classifies MYF as "unzoned" indicating that land uses are guided by the MYF ALUCP.

3.10.1.2 Surrounding Land Uses

The project site is located in the southwestern portion of MYF. MYF encompasses approximately 550 acres and is bound by Balboa Avenue to the north, Ruffin Road to the east, Aero Drive to the south, and Kearny Villa Road to the west. MYF is classified by the Federal Aviation Administration (FAA) as a general aviation airport, which is defined as a public-use airport that does not have scheduled service or has less than 2,500 passenger boardings. Activities at MYF encompass all aviation except air carrier services (defined as engaging in air transportation interstate, overseas or the transportation of mail). The types of general aviation aircraft that operate at MYF include private, corporate, charter, air ambulance, law enforcement, fire rescue, flight training, and cargo. Landside facilities at MYF include the terminal building (including administrative offices and the restaurant), hotel, hangars (including the existing Miramar Hangar on the project site), parking lots, entrance roads, and support facilities, while airside facilities consist of three runways and 12 taxiways.

As shown on Figure 2-3, the project site is located adjacent to taxiway L and the nearest runway to the project site is Runway 5/23, which is located approximately 1,200 feet northeast of the site. As described in the Draft Airport Master Plan (Draft AMP; City 2025) and shown on the Airport Layout Plan (ALP; City 2019a), the MYF runways and taxiways are surrounded by imaginary rectangular areas known as "safety areas" and "object free areas". The project site is located outside of these areas. In addition, the project site is located outside of the Building Restriction Line included on the ALP and is therefore not subject to the building height restriction of 35 feet.

To the west of the project site is Kearny Villa Road, with San Diego Fire-Rescue Department (SDFD) Station 28, SDFD Emergency Command and Data Center, and the SDFD Repair Facility located to the west beyond Kearny Villa Road, between MYF and Interstate (I-) 805. State Route (SR) 163 runs north-south to the west and I-15 runs north-south to the east.

3.10.2 Regulatory Framework

A summary of federal, state, regional, and local regulations that pertain to land use and planning is provided below. No District regulations regarding land use and planning apply to the project.

3.10.2.1 Federal

Federal Aviation Regulations Part 77

Federal Aviation Regulations Part 77 outlines the standards for identifying structures that could be obstructions to navigable airspace, sets forth requirements for notice to the FAA of certain proposed construction or alteration, and provides for aeronautical studies of obstructions to determine their effect on the safe and efficient use of airspace. Federal law requires sponsors of proposed structures or objects (including buildings, antennas, trees, and mobile and temporary objects, such as construction cranes) that exceed 14 Code of Federal Regulations Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alteration (Form 7460-1). Notification criteria includes proposed construction or alteration that meet any of the following:

- The structure exceeds 200 feet in height above ground level at its site.
- The structure penetrates "imaginary surfaces" stretching outward and upward from an airport. The specific slope and distance depend on the longest runway:
    - Runways over 3,200 feet: 100:1 slope for a horizontal distance of 20,000 feet.
    - Runways 3,200 feet or less: 50:1 slope for a horizontal distance of 10,000 feet.
    - Heliports: 25:1 slope for a horizontal distance of 5,000 feet
    - Emit frequencies
- Any highway, railroad or other traverse way where the prescribed adjusted height would exceed the above noted criteria.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location.

The FAA may also require notification for structures or objects of lower height that may cause signal reception interference with navigational aids.

3.10.2.2 State

California Planning and Zoning Law

The legal framework in which California's cities and counties exercise local planning and land use functions is provided in the California Planning and Zoning Law (Government Code Sections 65000 through 66499.58). Under this state planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how they create a general plan, but there are fundamental requirements that must be met. These requirements involve the inclusion of nine mandatory elements described in the Government Code: land use, circulation, housing, conservation, open space, noise, safety, environmental justice, and air quality. Only cities and counties that have identified disadvantaged communities must address environmental justice, including air quality, in their general plans. However, pursuant to Government Code Section 53094, local City zoning and land use plans are not applicable to District owned and leased properties as discussed further below.

Senate Bill 375

As described further in Section 3.7.2.2, Senate Bill (SB) 375 requires coordination of land use planning, regional transportation plans (RTPs), and funding priorities to reduce greenhouse gas (GHG) emissions from passenger vehicle travel within each Metropolitan Planning Organization (MPO) planning area. As it pertains to land use planning, each MPO must create a Sustainable Communities Strategy (SCS) to achieve its regional GHG emissions reduction goal through the development of more compact, complete, and efficient communities. For the project area, the San Diego Association of Government's (SANDAG's) 2025 Regional Plan achieves the requirements of SB 375.

3.10.2.3 Regional

San Diego Association of Governments 2025 Regional Plan

The SANDAG 2025 Regional Plan was adopted by the SANDAG Board of Directors on December 12, 2025, and includes the region's RTP; SCS, as required by SB 375; and Regional Comprehensive Plan (SANDAG 2025). The 2025 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The SCS describes coordinated transportation and land use planning that exceeds the State's target for reducing per capita greenhouse gas emissions set by the California Air Resources Board (CARB).

Draft Airport Master Plan and Airport Layout Plan

The Draft AMP (City 2025) defines the vision and provides the necessary framework to guide future airport development at MYF for a 20-year period. The Draft AMP is still undergoing environmental review and is still a draft document that has not yet been approved by the City. The Draft AMP provides a report of existing conditions, a forecast of aviation activity, facility requirements needed to accommodate the forecasted aviation activity, development and evaluation of alternatives to meet those needs, and an environmental overview and phased funding plan for the planned development. The Draft AMP additionally includes the ALP (City 2019a) for MYF which is a scaled set of drawings of current and future airport facilities within a 20-year planning period. These drawings require approval by

the FAA, which makes the airport eligible to receive federal funding for airport improvements and maintenance.

The ALP graphically depicts planned development at the airport within the 20-year planning period of the Draft AMP (refer to Figure 2-3). The existing Miramar Hangar that is located on the project site is identified as existing Building 8, Large Box Hangar. The ALP identifies the southern and eastern portion of the project site as an area for future development of hangars during the long-term phase of airport development under the Draft AMP (11-20 years). As discussed in Chapter 2.0, *Project Description*, of this EIR, the southernmost portion of the project site would overlap with the location for project 3-8 identified on the Draft ALP, which includes the construction of additional hangars. However, construction of the project's southern parking area would not be within the building footprint of these hangars. The ALP identifies the project site as being located within the FAA Part 77 Approach Surface, the Threshold Siting Surface, and the Departure Surface, each of which extend from Runway 5/23.

Airport Land Use Compatibility Plans

The San Diego County Regional Airport Authority (SDCRAA) serves as the Airport Land Use Commission (ALUC) for San Diego County (County). The SDCRAA is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for 16 public use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general. An ALUCP contains policies and criteria that address compatibility between airports and the future land uses that surround them in the areas of noise, overflight, safety, and airspace protection, in order to minimize the public's exposure to hazards within the Airport Influence Area (AIA) for each airport.

Each AIA is divided into two review areas. Review Area 1 is defined by the combination of the 60 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour, the outer boundary of all safety zones, and the airspace. Review Area 1 consists of locations where noise or safety concerns may necessitate limitations on the types of land use actions, and all compatibility policies and standards in the ALUCP apply. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1, and only airspace protection and overflight policies and standards apply. The SDCRAA has no jurisdiction over the operation of airports (except for San Diego International Airport [SDIA]) or over existing land uses, regardless of whether or not such uses are incompatible with airport activities. Once ALUCPs have been adopted, local agencies with land located within the AIA boundary for any of the airports must, by law, amend their planning documents to conform to the applicable ALUCP.

Section 132.1550, *Airport Land Use Commission Review*, of the San Diego Municipal Code states that prior to approval of development within the Airport Land Use Compatibility Overlay Zone (which applies to properties that are located within an AIA as identified in an adopted ALUCP), the applicant shall obtain a consistency determination from the ALUC for the following types of development:

(1) Development in the Clear Zone or Safety Zone 1;

(2) Development that would deviate from density and intensity thresholds for uses identified as limited in Tables 132-15G, 132-15H, 132-15I, or 132-15J. If the Airport Land Use Commission determines the development is inconsistent, then an overrule action by the City Council pursuant to Section 132.1555 and a Process Five Site Development Permit are required;

(3) Development that has been determined to be a hazard by the FAA;

(4) Development that includes a rezone or approval of a land use plan or amendment of a land use plan within Review Area 1 of the Airport Land Use Compatibility Overlay Zone; and

(5) Development that would include non-aviation uses located on airport property (public use airport only), or approval or amendment of an airport master plan.

Montgomery Field Executive Airport ALUCP

The Montgomery Field ALUCP was adopted January 25, 2010 and amended December 20, 2010. It establishes the AIA for the airport, which serves as the boundary for the ALUCP and is divided into two review areas. The project site is within the AIA for MYF (Review Area 1) and Safety Zone 2 (Inner Approach/ Departure Zone; SDCRAA 2010). Safety zones are established for the purpose of evaluating the safety compatibility of land use actions in the AIA of the airport. The project site is not within the existing (2009) 60 dB CNEL (or greater) noise contours of the MYF airport found within the ALUCP. The noise contours established for the purpose of evaluating the noise compatibility of land use actions in the AIA and reflect the anticipated growth of the airport for at least the next 20 years.

San Diego International Airport ALUCP

The AIA associated with SDIA is defined as the area encompassed by the outermost boundaries of the combined safety zones, 60 dB CNEL noise contour, airspace protection area, and overflight area, within which the policies and standards of the ALUCP apply. The project site is not located within the safety zones, 60 dB CNEL noise contour, or airspace protection area, but is located within the AIA and Overflight Area Boundary for SDIA (SDCRAA 2025). Chapter 5 of the SDIA ALUCP identifies overflight compatibility policies for SDIA. These policies include Policy O-1, establishing the overflight boundary, shown on SDIA ALUCP Exhibit 5.1. Policy O-2 requires overflight notification from local agencies to owners of any newly constructed dwelling units located within the overflight notification area.

Marine Corps Air Station Miramar ALUCP

The project site is located within the AIA for Marine Air Corps Station (MCAS) Miramar (SDCRAA 2008). The project site is not located within safety zones, the 60 dB CNEL noise contour, or overflight zones associated with MCAS Miramar, but is located within Review Area 2 of the AIA and within the Federal Aviation Regulations Part 77 Airspace Protection Combability Area for the facility. Airspace Protection Compatibility Policies for MCAS Miramar are contained in Section 3.5 of the ALUCP and apply to all of the AIA for MCAS Miramar (Review Areas 1 and 2). These policies are related to evaluating airspace protection computability for new development, airspace protection surfaces set forth in Federal Aviation Regulations Part 77, measures of airspace protection compatibility, requirements for FAA notification of proposed construction, ALUC airspace obstruction criteria, and other flight hazards.

3.10.2.4 District

Miramar College Master Plan

The Miramar College Facilities Path to 2035 (Master Plan) was finalized on April 18, 2022. The Master Plan details proposed campus-wide improvements at Miramar College to replace aging buildings and enhance campus connectivity. The designs and concepts presented in the Master Plan are conceptual and intended to serve as a framework for the future detailed design of campus improvements as funding becomes available. The proposed project is not specifically addressed in the Miramar College

Master Plan, except to note that "The Aviation Facilities likely will work with the off-site location at Montgomery Field."

District Design Guidelines and Standards Manual

The 2025 District Design Guide and Standards Manual (District 2025) was prepared for use by the design professionals and construction teams during the planning and design phases of renovation and construction projects for the District. It outlines the design approach, space allocation, physical environment, materials, and system requirements, and provides technical standards that the design and construction teams will be expected to meet or exceed. The general criteria and standards provided in this manual apply to all campuses within the District, and specific requirements related to each campus are provided in individual campus guidelines and during the design process. This document also identifies the District's Sustainability and Climate Strategy. Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and Sustainability Levels. These details are discussed in more detail in Section 3.7, *Greenhouse Gas Emissions*.

3.10.2.5 Local

City of San Diego General Plan

An update to the City General Plan was adopted in 2024, building off of the City of Villages strategy, which was first adopted as part of the Strategic Framework Element of the City's 2002 General Plan. The Strategic Framework Element represented the City's new approach for shaping how the City would grow while attempting to preserve the character of its communities, natural resources, and amenities. Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural, undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure. The City General Plan is developed to provide a structure to guide future community plan updates and amendments, which provide localized land use plans for the City. The City's General Plan classifies MYF as "unzoned" indicating that land uses are guided by the MYF ALUCP, which is discussed in Section 3.10.2.3 above.

Kearny Mesa Community Plan

The Kearny Mesa Community Plan identifies key issues, goals, and implementation actions for the community primarily focused on maintaining the community as a regional employment center. The plan was most recently updated in November 2020. While MYF, including the project site, is technically within the boundaries of the Kearny Mesa planning area, the land use policies relevant to MYF are contained in the ALUCP, which is discussed above. The Kearny Mesa Community Plan requires that any proposed development be reviewed for compatibility with both MYF and the MCAS Miramar, per the specifications in the ALUCP. Goals set forth in the adopted Kearny Mesa Community Plan are contained in its individual chapters, which include Vision and Land Use; Regulatory Framework and Policies; Historic Preservation; Mobility; Urban Design; Parks, Recreation, and Open Space; and Public Facilities, Services, and Safety.

Specific policies included in the Kearny Mesa Community Plan that are relevant to the airport include the following:

- Policy 1.26: Ensure that future uses, building intensity, residential density, and heights are compatible with the safety zones, noise contours, and airspace protection surfaces identified in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for Montgomery-Gibbs Executive Airport and MCAS Miramar.

- Policy 1.27: Review development for consistency with adopted airport policies, such as those set forth in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for Montgomery-Gibbs Executive Airport and MCAS Miramar.

- Policy 4.20: Coordinate with the Montgomery-Gibbs Executive Airport and/or other adjacent property owners on the implementation of the urban pathways comprised of a combination of pedestrian ways, bike lanes, multi-use paths, linear parks and/or trails for the Airport Loop, Aero Promenade, Opportunity Trails, and Park Link.

San Diego Municipal Code

Chapter 13, Article 2, Division 15 of the San Diego Municipal Code establishes an Airport Land Use Compatibility Overlay Zone to implement adopted Airport Land Use Compatibility Plans, in accordance with state law, as applicable to property within the City. The intent of the regulations is to ensure that new development located within an airport influence area is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. The project site is located within the MCAS Miramar and Montgomery Field Airport Land Use Compatibility Overlay Zones (ALUCOZ; City 2026).

The purpose of the City's Historical Resources Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures, historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles, and the rights of private property owners. For development projects regulated by the City, these regulations apply to proposed development when the following historical resources are present on the site: designated historical resources, historical buildings, historical districts, historical landscapes, historical objects, historical structures, important archaeological sites, and traditional cultural properties.

Climate Action Plan

On August 2, 2022, the San Diego City Council adopted the 2022 Climate Action Plan (CAP) update to establish a community-wide goal and roadmap to net-zero emissions by 2035. The 2022 CAP includes the following six strategies: decarbonization of the built environment, access to clean and renewable energy, mobility and land use, circular economy and clean communities, resilient infrastructure and healthy ecosystems, and emerging climate actions (City 2022). The City is in the process of preparing a

Climate Action Plan Update to maintain alignment with state targets and goals for reducing emissions, which is anticipated to be complete in 2027.

As proposed in the 2022 CAP, in October 2022, the City Council approved an amendment to the Land Development Code (San Diego Municipal Code Chapter 14, Article 3, Division 14), which established the CAP Consistency Regulations. The CAP Consistency Regulations replaced the CAP Consistency Checklist previously established by the City's 2015 CAP as the measures that could be implemented on a project-by-project basis to streamline evaluation of GHG emissions under CEQA pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Implementation of these measures would ensure that new development projects are consistent with relevant CAP strategies that work toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impact analysis of GHG emissions.

Multiple Species Conservation Program

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through Subarea Plans (SAPs), which describe specific implementing mechanisms.

The City of San Diego's MSCP SAP was approved in March 1997. The MSCP SAP is a plan and process for the issuance of permits under the Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA) and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP SAP is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement with U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The Implementing Agreement serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and SAP. The Implementing Agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

Framework Management Plan

The MSCP SAP Framework Management Plan, included in Section 1.5.1 of the City's MSCP SAP, sets management goals and objectives to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction, and minimizing the need for future listings, while enabling economic growth in the region. Section 1.5.2 of the SAP lists general management directives that apply throughout the SAP area related to mitigation; restoration; public access, trails, and recreation; litter/trash and materials storage; adjacency management issues; invasive exotics control and removal; and flood control.

The project site is identified within Section 1.2.3 of the SAP as being in an "Urban Area" and as containing "Urban Habitat Lands". The urban habitat areas within the City's Multi-Habitat Planning Area (MHPA) are primarily concentrated in existing urbanized locations and consist mainly of vernal pool areas, urbanized canyons and stream areas, and associated hillsides which support native habitats and

species and promote wildlife movement. Specific and overall management policies and directives for Urban Habitat Lands are listed in SAP Section 1.5.7. Future development within areas identified as Urban Habitats is required to support the overall goals and objectives for urban habitat lands as follows:

The optimum future condition for the urban habitat lands scattered throughout the City of San Diego is as a system of canyons that provide habitat for native species remaining in urban areas; i.e., as "stepping stones" for migrating birds and those establishing new territories and providing environmental educational opportunities for urban dwellers of all ages. The system of urban habitat canyons and natural open space throughout the City provides important areas for people to enjoy and learn about the natural world and local environment. These areas also afford visual beauty and psychological relief from urbanization, while supporting habitat for the maintenance of both common and rare species. These habitats, surrounded by development and modified by urban edge effects, also present unique opportunities for research into habitat fragmentation, viability, and urban wildlife ecology.

Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, with limited development permitted based on the development area allowance of the OR-1-2 zone (open space residential zone).

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biological Guidelines.

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.

As discussed in Section 3.3, *Biological Resources*, the project site is located more than 500 feet from the MHPA, and thus, the MHPA Land Use Adjacent Guidelines would not be applicable to the project.

Vernal Pool Habitat Conservation Plan

In October 2019, the City completed the Vernal Pool Habitat Conservation Plan (VPHCP; City 2019b), which is a comprehensive plan to provide conservation of vernal pool habitats and seven sensitive species that do not have coverage under the City's MSCP SAP. The VPHCP encompasses the entire City and MSCP SAP coverage area of approximately 206,124 acres, and includes some lands owned by the City that are within unincorporated San Diego County (i.e., Cornerstone Lands which include water supply areas for the City). Some lands within the City limits not under City jurisdiction (e.g., school districts, water districts, federal and state lands, etc.) are not automatically covered by the VPHCP; however, those landowners can seek coverage under the VPHCP through a Certificate of Inclusion.

In addition to authorizing take of sensitive vernal pool species, the VPHCP serves to expand the City's MHPA, with a focus on the management and conservation of vernal pool habitats and their associated species, particularly the covered species of the VPHCP. The VPHCP is comprised of three Planning Units; north, central, and south. The project site is located within the central planning of the VPHCP, but does not contain areas conserved under the VPHCP.

The seven species covered under the VPHCP are threatened and endangered species that do not have federal take coverage under the MSCP SAP and include five plants and two animals: Otay Mesa mint (*Pogogyne nudiuscula*), San Diego mesa mint (*Pogogyne abramsii*), Spreading navarretia (*Navarretia fossalis*), San Diego button-celery (*Eryngium aristulatum var. Parishii*), California Orcutt grass (*Orcuttia californica*), Riverside fairy shrimp (*Streptocephalus woottoni*), San Diego fairy shrimp (*Branchinecta sandiegonensis*).

3.10.3 Thresholds of Significance

Thresholds used to evaluate potential land use and planning impacts are based on CEQA Guidelines Appendix G. A significant land use and planning impact could occur if implementation of the proposed project would:

1. Physically divide an established community; or

2. 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.

3.10.4 Impact Analysis

3.10.4.1 Physically Divide an Established Community

Threshold 1: Would the project physically divide an established community?

Impact Discussion

The project site is currently developed with the existing hangar, paved, and unpaved areas on airport property. Typically, the division of an established community would result from the construction of a physical barrier to neighborhood access or the removal of a means of access, including public roads. Controlled access (via the existing asphalt paved road with a gate that is known as MYF Gate 4) would be maintained to the site during the various construction phases and during the long-term operation of the project. The project would not physically divide an established community as the construction phases and operation of the project would not include the placement of features that would create a physical barrier that would hinder existing community access. The project would ultimately result in the continuation of existing activities at the project site, albeit in a larger sized hangar. The proposed 18,000-square-foot hangar would not be of sufficient size or bulk to create a division. Therefore, the project would not result in the physical division of a community and **no impact would occur**. No mitigation is required.

3.10.4.2 Conflict with an Applicable Land Use Plan, Policy, or Regulation

Threshold 2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Discussion

Plans, policies, and regulations considered in this analysis include Federal Aviation Regulations Part 77, SANDAG Regional Plan, Miramar College Master Plan, District Design Guide and Standards Manual, Draft MYF AMP and ALP, applicable ALUCPs, the City of San Diego General Plan, Kearny Mesa Community Plan, San Diego Municipal Code, the City's CAP, the MSCP Subarea Plan, MHPA, MHPA Land Use Adjacency Guidelines, and VPHCP.

Federal Aviation Regulations Part 77

As described in Section 2.0, *Project Description*, the project would require approval of Notice of Proposed Construction or Alteration Form 7460-1. The project is not expected to create an obstruction to navigable airspace; however, the formal review and approval process through the FAA would ensure compliance with the requirements of FAA Part 77.

SANDAG Regional Plan

The SANDAG Regional Plan is a long-range plan for transportation, land use, housing, and the environmental needs of the San Diego region through the year 2050. The goals of the 2025 Regional Plan include convenient and reliable movement of people and goods; equitable access to essential needs and opportunities; healthy communities and environment for everyone; and safe transportation network for all users (SANDAG 2025). The project would result in the continuation of existing uses at the project site and would not interfere with implementation of projects by SANDAG or other agencies.

Miramar College Master Plan

The Miramar College Master Plan addresses campus-wide improvements at Miramar College to replace aging buildings and enhance campus connectivity. The existing Miramar Hangar facility, although briefly mentioned in the Miramar College Master Plan, is not included in the physical Miramar College campus or included in the scope of the Miramar College Master Plan. The project is part of the District's long-range planning but is not specially connected to the Miramar College Master Plan and would not result in conflicts with the plan.

District Design Guidelines and Standards Manual

The District relies on the comprehensive design standards and sustainability frameworks within the Design Guidelines and Standards Manual to guide development including the design approach, space allocation, physical environment, materials, and system requirements, and provides technical standards that the design and construction teams will be expected to meet or exceed. The project would apply the applicable standards to be consistent with the requirements of the District Design Guide and Standards Manual, with the exception of the classroom building exterior-to-interior noise limits (which is discussed further in Section 3.11, *Noise*, of this EIR).

Draft Airport Master Plan and Airport Layout Plan

As discussed in Section 3.10.2.3 above, the Draft AMP for MYF identifies existing and future conditions, an ALP, and a schedule of priorities and funding sources for proposed improvements. Although the Draft AMP is not adopted and is not officially the regulatory document for the project site until it is adopted, an analysis of consistency with the Draft AMP is provided. The project site is located to the west of taxiway L and contains the existing Miramar Hangar, identified in Building 8, Large Box Hangar, on the ALP. The project site is not specifically planned for improvements in the ALP; however, as shown on Figure 2-3, the ALP identifies the southern and eastern portion of the project site as an area for future development of hangars during the long-term phase of airport development under the Draft AMP (11-20 years). To the south and northeast of the project site, the ALP additionally shows that hangars would be constructed during the long-term Draft AMP buildout. The nearest runway to the project site is Runway 5/23, which is approximately 1,200 feet northeast of the site. As shown on Figure 2-3, the project site is located outside of the safety and object free areas. In addition, the project site is located outside of the Building Restriction Line included on the ALP and is therefore not subject to the building height restriction of 35 feet.

The proposed project would continue the use of the project site for instructional purposes. The project would not alter the land uses occurring at the project site or at MYF as a whole, nor would it alter the forecasted aviation activity. The project would provide an upgraded, modernized hangar consistent with existing uses of the site; however, the development of this upgraded facility was not anticipated in the Draft AMP and ALP. The project would include a revision to the ALP concept plan to include the proposed hangar in the ALP, which is subject to review and approval by the City of San Diego. The Draft AMP specifically states that to minimize impacts to historic resources the Miramar Hangar would not be altered. The project would deviate from the Draft AMP by demolishing the Miramar Hangar. As discussed in Section 3.4, *Cultural Resources* of this EIR, the project would incorporate mitigation in the form of Historic American Buildings Survey (HABS) documentation (mitigation measure HIST-1) to minimize the significant effects to the historic structure; however, even with incorporation of mitigation measures, the impact to the historic structure would remain significant and unavoidable. The project would further incorporate mitigation measure NOI-2, to limit construction vibration limits near the two historic structures located in close proximity to the project site, which would reduce vibration noise impacts to the adjacent historic structures to a less than significant level. The project site is not within the 60 dB CNEL (or greater) noise contours of the MYF airport as shown in the ALUCP (SDCRAA 2010). As discussed further under the ALUCP discussion below, interior noise levels would be reduced to compatible levels with implementation of mitigation measure NOI-3. Even with implementation of mitigation measures to minimize impacts to the on-site and adjacent historic structures, the project would result in an inconsistency with the Draft AMP and ALP. Although the AMP is a Draft document and not adopted by the City, this is conservatively considered a significant impact.

Airport Land Use Compatibility Plans

As discussed in Section 3.10.2.2, the project site is within the AIA and Safety Zone 2 associated with MYF (SDCRAA 2010), is within the Overflight Area Boundary and AIA associated with SDIA (SDCRAA 2025), and is within the Airspace Protection Compatibility Area and Review Area 2 of the AIA associated with MCAS Miramar (SDCRAA 2008).

As stated in Section 2.6.2 and Section 2.6.3 of the MYF ALUCP, all land use actions within Review Area 1 are subject to ALUC review. However, ALUC staff has the authority and discretion to make a consistency

determination without formal ALUC review of the project if the land use action: (1) is "compatible" with both noise and safety compatibility policies; and (2) has received a final notice of determination from the FAA that the project would not constitute a hazard or obstruction to air navigation, to the extent applicable; and (3) has been conditioned by the local agency to require an overflight notification consistent with the requirements of Policy 3.6.3 (of the ALUCP), to the extent applicable (SDCRAA 2010). As the project would be required to comply with the relevant policies outlined in the ALUCPs for MYF and SDIA through applicable project review by the ALUC or ALUC Staff Review, the project would be consistent with these ALUCPs.

For informational purposes, however, a comparison of the requirements of Safety Zone 2 is provided. Safety zones are established for the purpose of evaluating the safety compatibility of land use actions in the AIA of the airport. The project site is located within Safety Zone 2 of MYF, which is the Inner Approach/Departure Zone. As discussed in Section 3.8, *Hazards and Hazardous Materials*, colleges and universities are considered "incompatible" in Safety Zones 1, 2, and 5. However, the proposed facility is an ancillary classroom setting within a large box hangar off site from an actual college campus, is the modernization of an existing airport-based aviation maintenance instructional facility at the same location on the MYF property, is not a separate college or university campus, and would not be an incompatible land use. Non-residential development criteria in the ALUCP, which applies to most proposed non-residential development, except uses where additional or different criteria apply (identified in Section 3.4.5 of the ALUCP) identify a maximum acceptable intensity of people within different safety zones, based on intensity per gross acre. None of the criteria identified in Section 3.4.5 of the ALUCP would be applicable to the project, so the maximum acceptable intensity for nonresidential development is applicable to the project. Within Safety Zone 2, the maximum acceptable intensity is 70 people per acre, which would equate to 74 people on the 1.06-acre project site. Based on average class sizes of 23 people, and including proposed staff and/or instructors, two classes simultaneously could occur on the 1.06-acre project site while maintaining an intensity well below the identified 70 people per gross acre. As the project would comply with the allowable intensity identified in the ALUCP for Safety Zone 2, the project would not result in inconsistencies with the Safety Zone policies of the ALUCP.

As discussed under the Draft AMP discussion above, the project site is not within the 60 dB CNEL (or greater) noise contours of the MYF airport as shown in the ALUCP (SDCRAA 2010). However, based on the forecast noise contours for the Draft AMP (City 2025), the proposed building is anticipated to be exposed to aircraft noise levels below 65 dBA CNEL. Table III-1 of the ALUCP defines the noise compatibility standards for classrooms, offices, and related indoor uses of adult schools, colleges, and universities. These uses are conditionally compatible with noise exposure levels between 60 and 70 dBA CNEL if the building structure is capable of maintaining interior noise levels of 45 dBA L_{EQ}. Outdoor uses are acceptable, though some noise interference may occur (SDCRAA 2010). As discussed further in Section 3.11, *Noise*, the project would implement mitigation measure NOI-3 which would ensure that interior noise levels would be reduced to compatible levels as identified in the ALUCP.

Although the project site is located within the Overflight Area Boundary associated with SDIA, the overflight notification requirements contained in Policy O-2 of the SDIA ACLUP are not applicable to the project, as the project would not construct new dwelling units. In addition, the project site is located within the Airspace Protection Compatibility Area and Review Area 2 of the AIA for MCAS Miramar. The project site is not located within any other safety or noise compatibility zones for SDIA or MCAS Miramar and would not conflict with any related policies.

As discussed in Section 3.10.2.3 above, the San Diego Municipal Code outlines development types within the Airport Land Use Compatibility Overlay Zone (which applies to properties that are located within an AIA) which are subject to a formal ALUC consistency determination. In accordance with these criteria, the project does not propose development in the Clear Zone or Safety Zone 1; would not deviate from the applicable density and intensity thresholds; does not propose development that has been determined to be a hazard by the FAA (refer to the Federal Aviation Regulations Part 77 discussion above); does not propose a rezone or land use plan amendment; and would involve uses that are considered by the ALUCP to be "aviation uses". Therefore, the project would not be subject to a formal consistency determination by the ALUC.

City of San Diego General Plan and Kearny Mesa Community Plan

The General Plan aims to direct new development projects into urbanized areas where a mix of uses occur and public infrastructure is available. Although the General Plan includes policies related to education facilities, it does not specifically address the District or the Aviation Operations Program at Miramar College, including the specific programs of Aircraft Maintenance, Pilot Training, and Air Traffic Control. However, the project would continue the existing use of the project site and would be consistent with the adjacent airport uses and surrounding uses. The project site is mapped as an Institutional land use in the Kearny Mesa Community Plan and would continue this land use with project implementation.

San Diego Municipal Code

San Diego Municipal Code Chapter 13 Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for MCAS Miramar, Montgomery-Gibbs Executive Airport, Brown Field, and Gillespie Airport is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. The project site is within the MCAS Miramar and Montgomery Field Airport Land Use Compatibility Overlay Zones. The purpose of these zones is to implement the adopted ALUCPs for each airport. Through adherence to the City's Airport Land Use Compatibility Overlay Zone Regulations, impacts associated with consistency with the Airport Land Use Compatibility Overlay Zone Regulations would be less than significant.

As the project would result in the demolition of the Miramar Hangar, it would not be consistent with the purpose of the City's Historical Resources Regulations, which are intended to protect, preserve, and where damaged, restore the historical resources of San Diego, including historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes and traditional cultural properties. As discussed in Section 3.4, *Cultural Resources,* of this EIR, the project would incorporate mitigation in the form of Historic American Buildings Survey (HABS) documentation (mitigation measure HIST-1) to minimize the significant effects to the historic structure; however, even with incorporation of mitigation measures, the demolition of the historic structure would not be consistent with the intent of the City's Historical Resource Regulations. As discussed in Section 3.4, *Cultural Resources,* of this EIR, impacts to the historic resources would remain significant and unavoidable, with implementation of mitigation.

Climate Action Plan

The project would not conflict with the City's CAP as described in Section 3.7, *Greenhouse Gas Emissions*.

Multiple Species Conservation Program Subarea Plan, Multi-Habitat Planning Area, MHPA Land Use Adjacency Guidelines

The nearest MHPA is located approximately 525 feet northeast of the study area on the airport property. As discussed in Section 3.3, *Biological Resources*, implementation of the project would not result in direct or indirect impacts to biological resources in the MHPA, which is at a distance greater than 500 feet from project activities. Due to the MHPA's distance from the project site, the MHPA Land Use Adjacency Guidelines would not apply to the project. The project does not propose development that would directly or indirectly affect the biological resources occurring on MHPA lands, and no impacts to the City's MSCP program would occur from the implementation of the project.

Vernal Pool Habitat Conservation Plan

The project occurs outside of areas conserved in the VPHCP and VPHCP does not show vernal pools as occurring on the project site (HELIX 2026; Appendix C). As the proposed project does not occur immediately adjacent to the VPHCP Hardline preserve, no permanent fencing or signage is proposed. As the project occurs outside of areas conserved in the VPHCP, the project would not conflict with or be inconsistent with the VPHCP. Please refer to Section 3.3, *Biological* Resources, for a description of potential impacts to fairy shrimp, which do not constitute a conflict with the VPHCP.

As discussed above, the project would result in a conflict with the Draft AMP and the City's Historical Resources Regulations. Therefore, the project would result in a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **Impacts would be significant**

Mitigation Measures

As discussed above, the project would implement mitigation measures identified in other sections of the EIR to reduce impacts to the on-site and historic structures to the extent feasible (HIST-1 and NOI-2). There is no additional feasible mitigation to reduce the land use inconsistency impact.

Level of Significance After Mitigation

Land use plan and regulation consistency impacts would remain significant and unavoidable.

3.10.5 Cumulative Impact Analysis

The geographic scope for the land use cumulative analysis includes the City of San Diego, including future development associated with the Kearny Mesa Community Plan and future projects on MYF property associated with the Draft AMP. Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions but can have implications on surrounding areas.

3.10.5.1 Physically Divide an Established Community

Cumulative development projects proposed within the City would likely occur within individual properties or connected groups of properties and are not anticipated to divide established communities as the City is largely developed with existing development, circulation features, and dedicated open space defining locations with the potential for further development. In addition, cumulative

development projects would be evaluated for compliance with existing zoning and land use planning documents established by the City and it is anticipated that the City would require minimization efforts to prevent impacts related to community division. Therefore, cumulative impacts of the proposed project, in combination with cumulative development projects, related to the physical division of an established community would be **less than significant**.

3.10.5.2 Conflict with an Applicable Land Use Plan, Policy, or Regulation

Cumulative development projects within the City would be evaluated for compliance with the City's General Plan, the applicable community plan, and applicable policies and regulations adopted for the purpose of avoiding or mitigating environmental effects, where applicable. Projects that are not consistent with existing land use designations would require approval of a General Plan and/or Community Plan amendment and would require environmental review under CEQA. Projects that require a land use plan amendment are required to demonstrate conformance with pertinent goals, policies, and recommendations. Where significant or potentially significant environmental impacts are identified, implementation of feasible mitigation would be required to reduce or avoid significant land use impacts. Nonetheless, the environmental effects of future projects could remain significant. The project would result in a significant and unavoidable impact related to consistency with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, significant cumulative impacts related to consistency with the land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect could occur due to future development within the City, and the project contribution to such impacts **would be cumulatively considerable and significant**.

3.11 Noise

This section addresses the potential noise impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to noise are also addressed. This section relies on the information and analysis in the Noise Technical Report (HELIX 2026), provided as Appendix H to the EIR.

3.11.1 Environmental Setting

3.11.1.1 Noise Descriptors and Terminology

Noise Descriptors

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ}, with a specified duration, or L_{MAX} to indicate the maximum sound level. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level, which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours but no added weighting on the evening hours. Sound levels expressed in CNEL and the Day Night sound level are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

Noise Terminology

Sound, Noise, and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz, or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (µPa). One µPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different

kinds of noise environments can range from less than 100 to 100,000,000 µPa. Because of this wide range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of dBA. The threshold of hearing for the human ear is about 0 dBA, which corresponds to 20 µPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through standard arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than from one source under the same conditions. For example, if one automobile produces an SPL of 70 dBA when it passes an observer, two cars passing simultaneously would not produce 140 dBA – rather, they would combine to produce 73 dBA. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dBA louder than one source.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern 1 dBA changes in sound levels when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hz to 8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dBA are generally not perceptible. It is widely accepted, however, that people begin to detect sound level increases of 3 dBA in typical noisy environments. Further, a 5 dBA increase is generally perceived as a distinctly noticeable increase, and a 10 dBA increase is generally perceived as a doubling of loudness.

No known studies have directly correlated the ability of a healthy human ear to discern specific levels of change in traffic noise over a 24-hour period. Many ordinances, however, specify a change of 3 CNEL as the significant impact threshold. This is based on the concept of a doubling in noise energy, resulting in a 3 dBA change in noise, which is the amount of change in noise necessary for the increase to be perceptible to the average healthy human ear.

3.11.1.2 Ground-borne Vibration Descriptors and Terminology

Ground-borne vibration consists of rapidly fluctuating motions or waves transmitted through the ground with an average motion of zero. The rumbling sound caused by the vibration of room surfaces due to ground-borne vibration is called ground-borne noise. Ground-borne noise is highly dependent on the characteristics of the structure subject to vibration. Therefore, this analysis focuses on ground-borne vibrations. Sources of ground-borne vibrations include natural phenomena and anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions).

Peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration wave. Decibels are also used to compress the range of numbers required to describe vibration. A vibration velocity level (L_V) with units of VdB (referenced to one-micro-inch per second velocity) is commonly used in evaluating human reactions to vibrations, as it describes the "smoothed" vibration amplitude. For the purposes of this analysis, L_V with units of VdB is used to evaluate construction-generated vibration for building damage and human reactions.

Noise and Vibration-Sensitive Land Uses

Noise-sensitive land uses (NSLUs) are land uses that may be subject to stress and/or interference from excessive noise, such as residential dwellings, schools, transient lodging (hotels), hospitals, educational facilities, and libraries. Industrial and commercial land uses are generally not considered sensitive to noise. Noise receptors are individual locations that may be affected by noise. The nearest existing off-site NSLU to the project site is the Four Points by Sheraton hotel to the south of the project. The hotel property is adjacent to the project site, with the hotel building approximately 675 feet southeast of the existing hangar building.

Land uses in which ground-borne vibration could potentially interfere with operations or equipment, such as research, hospitals, and university research operations (California Department of Transportation [Caltrans] 2020), are considered "vibration-sensitive." The structural integrity of specific buildings, particularly old or historic structures, has the potential to be vibration-sensitive due to their age, method of construction, or other factors. In addition, excessive levels of ground-borne vibration of either a regular or an intermittent nature can result in annoyance to residential uses, schools, or transient lodging. Land uses in the vicinity of the project site that are subject to annoyance from vibration include the hotel described above. The neighboring existing hangars to the north are considered historic resources (City 2025). As such, due to their age, these hangars are considered vibration-sensitive.

3.11.1.3 Existing Noise Environment

The existing noise environment is dominated by traffic noise from the nearby State Route (SR) 163 freeway and noise from aircraft operations associated with the Montgomery-Gibbs Executive Airport (MYF), such as takeoffs, landings, and taxiing and idling aircraft. There is also noise from vehicles along the adjacent Kearny Villa Road.

Montgomery-Gibbs Executive Airport

The project site is located within the MYF property and is therefore within its Airport Influence Area (AIA). The project is located outside of the MYF noise contours, as shown in the Airport Land Use Compatibility Plan (ALUCP; San Diego County Regional Airport Authority [SDCRAA] 2010). MYF has voluntarily enacted noise abatement procedures that are designed to reduce the amount of noise pollution in the surrounding community. These procedures include a combination of restricting departure times, positioning the use of louder aircraft on runways further from noise-sensitive land uses, and modification of flight operations during departures, ascents, landings, and descents.

Noise Survey

Noise measurements were taken on the project site to assess the existing noise environment, including the engine testing activity that currently occurs for instructional purposes. Two measurements were taken at 130 and 135 feet from the existing test engine location while the engine was operating, and one additional measurement was taken at 135 feet from the test engine location while the engine was turned off. The measured noise levels are shown in Table 3.11-1, *Noise Measurement Results.* Measurement locations are shown on Figure 3.11-1, *Noise Measurement Locations*.

Table 3.11-1
NOISE MEASUREMENT RESULTS

Measurement 1	
Date:	April 17, 2026
Time:	9:52 a.m. – 10:30 a.m.
Location:	130 feet from the portable engine
Measured Noise Level:	85.6 dBA L_{EQ}
Primary Noise Sources:	Portable engine, with additional noise from idling and flying aircraft and vehicles.
Measurement 2	
Date:	April 17, 2026
Time:	10:54 a.m. – 11:32 a.m.
Location:	135 feet from the portable engine
Measured Noise Level:	85.5 dBA L_{EQ}
Primary Noise Sources:	Portable engine, with additional noise from idling and flying aircraft and vehicles.
Measurement 3	
Noise Meter:	Larson Davis 831
Date:	April 17, 2026
Time:	10:33 a.m. – 10:44 a.m.
Location:	135 feet from the portable engine (not running)
Measured Noise Level:	62.0 dBA L_{EQ}
Primary Noise Sources:	Traffic from I-15 and flying aircraft.

dBA = A-weighted decibel; L_{EQ} = time-averaged noise level

3.11.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to noise is provided below.

3.11.2.1 Federal

Federal Transit Administration

Multiple federal agencies have developed noise standards that apply to projects carried out by the applicable agency. While none of these federal noise laws, regulations, or policies for noise and vibration apply to the project site, aspects of the Federal Transit Administration (FTA) noise impact analysis framework have been used for guidance in the analysis of the project's potential impacts. The FTA's Transit Noise and Vibration Impact Assessment Manual (FTA 2018) provides technical guidance and standards for construction and operational sources of noise and vibration, including for specific vibration-sensitive land uses such as historic structures and laboratory settings. Specific impact assessment procedures and thresholds from the Transit Noise and Vibration Impact Assessment Manual are described further below where they are used in this report.



I:\PROJECTS\S\SanDiegoComCollegeDist_01737\00004_SDCommunityCollegeDist\005_MiramarAviation\Map\EIR\EIR.aprx Fig3.11_1_Noise : 01737.00004.005 : 9/11/2026 - MCL

0 75 Feet

Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Noise Measurement Locations

Figure 3.11-1

3.11.2.2 State

California Noise Control Act

The California Noise Control Act is a section within the California Health and Safety Code that describes excessive noise as a serious hazard to the public health and welfare, and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

3.11.2.3 Regional

Airport Land Use Compatibility Plans

The SDCRAA, which acts as the Airport Land Use Commission for the County, maintains the ALUCPs for the County's airports. The ALUCPs contain policies to regulate land use and development near airports, including noise compatibility considerations. Consideration of airport compatibility related to noise is intended to result in new development that is compatible with aircraft noise. Specifically, each ALUCP provides guidance to local agencies to limit new noise-sensitive development within the noise compatibility boundary, identifies sound attenuation goals for noise-sensitive development, and considers if avigation easements are necessary. The project is within the boundaries of MYF and is therefore within its AIA (SDCRAA 2010). Table III-1 of the ALUCP defines noise compatibility standards for each land use category within the noise contours of the airport.

The project site is not within the noise contours shown in Exhibit III-1 of the ALUCP. Table III-1 of the ALUCP defines the noise compatibility standards for classrooms, offices, and related indoor uses of adult schools, colleges, and universities. These uses are conditionally compatible with noise exposure levels between 60 and 70 dBA CNEL if the building structure is capable of maintaining interior noise levels of 45 dBA CNEL. Outdoor uses are acceptable, though some noise interference may occur (SDCRAA 2010).

3.11.2.4 District

District Design Guidelines and Standards Manual

The 2025 District Design Guidelines and Standards Manual (District 2025) was prepared for use by design professionals and construction teams during the planning and design phases of renovation and construction projects for the District. It outlines the design approach, space allocation, physical environment, materials, and system requirements applicable to District projects, and provides technical standards that the design and construction teams are expected to meet or exceed. The general criteria and standards provided in the Design Guidelines and Standards Manual apply to all campuses within the District, and specific requirements related to each campus are provided in individual campus guidelines and during the design process. Requirements related to noise and vibration are outlined below.

Sustainability Goals

The District has developed environmental quality goals as part of these guidelines and standards. The following relates to noise:

Indoor/Outdoor Environmental Quality Goal 2: Improve indoor air quality and acoustics. **Key Performance Indicator (KPI):** Maintain indoor noise levels below 35 dB in classrooms and below 40 dB in shared spaces.

Design Guides & Standards

Section 2.1.3 of the District Design Guidelines and Standards Manual includes noise and vibration control criteria for all District projects, noting that noise and vibration control is the combined responsibility of all design professionals and consultants and must be considered in the design of every building or space. Generally, noise control is required to be provided to ensure usefulness of the facility

for the purposes for which the facility is designed whether that be studying, working, or socializing. Noise-producing equipment required for building operations should be designed to be located as far as possible from noise-sensitive areas such as classrooms. For specific guidance, the criteria note that noise control should be consistent with Occupational Safety and Health Administration (OHSA) requirements.

3.11.2.5 Local

City of San Diego General Plan, Noise Element

The Noise Element of the City's General Plan establishes noise compatibility guidelines for appropriate exterior noise levels at new land uses affected by traffic noise, as shown in Table 3.11-2, *City of San Diego Land Use Noise Compatibility Guidelines* (City 2024).

Table 3.11-2
CITY OF SAN DIEGO LAND USE NOISE COMPATIBILITY GUIDELINES

Land Use Category	Exterior Noise Exposure (CNEL)				
	<60	60-65	65-70	70-75	75+
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units		45	45		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities, including Vocational/Trade Schools and Colleges, and Universities		45	45		
Cemeteries					

Land Use Category	Exterior Noise Exposure (CNEL)				
	<60	60-65	65-70	70-75	75+
Retail Sales					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					50
Wholesale, Distribution, Storage Use Category					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					50
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					50
Research & Development				50	50

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas, including residential habitable areas, commercial work/shopping areas, and office areas associated with industrial uses.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Source: City 2024
CNEL = Community Noise Equivalent Level

City of San Diego Municipal Code

Section 59.5.0401, Sound Level Limits

San Diego Municipal Code Section 59.5.0401, as follows, establishes exterior sound level limits for the City that apply to operational noise sources. The permissible sound level is determined by the land use of the affected property, as provided in Table 3.11-3, *City of San Diego Exterior Noise Limits*.

(a) It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit given in the following table (Table 3.11-3), at any location in the City on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

Table 3.11-3
CITY OF SAN DIEGO EXTERIOR NOISE LIMITS

Land Use Zone	Time of Day	One-hour Average Sound Level (dBA)
Single Family Residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
Multi-Family Residential (up to a maximum density of 1/2000)	7:00 a.m. to 7:00 p.m.	55
	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All other Residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or Agricultural	Anytime	75

Source: City of San Diego Municipal Code, Section 59.5.0401
dBA = A-weighted decibel

(b) The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Permissible construction noise level limits shall be governed by Section 59.5.0404 of this article.

Section 59.5.0404 Construction Noise

San Diego Municipal Code Section 59.5.0404, as follows, establishes sound level limits for construction noise within the City. Generally, the Municipal Code permits construction between 7:00 a.m. to 7:00 p.m. Mondays through Saturdays with an average sound level of no greater than 75 dBA at the property line of a residentially zoned property during the 12-hour period.

(a) It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. In granting such permit, the Administrator shall consider whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime because of different population densities or different neighboring activities; whether obstruction and interference with traffic particularly on streets of major importance, would be less objectionable at night than during the daytime; whether the type of work to be performed emits noises at such a low

level as to not cause significant disturbances in the vicinity of the work site; the character and nature of the neighborhood of the proposed work site; whether great economic hardship would occur if the work were spread over a longer time; whether proposed night work is in the general public interest; and he shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise levels as he deems to be required in the public interest.

(b) Except as provided in subsection (c) hereof, it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dBA during the 12-hour period from 7:00 a.m. to 7:00 p.m.

(c) The provisions of subsection (b) of this section shall not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

Montgomery-Gibbs Executive Airport Draft Airport Master Plan

The Draft MYF Airport Master Plan (AMP; City 2025) serves as a planning document to determine the extent, type, and schedule of future development within the MYF master plan area. . Based on the forecast noise contours for AMP, the proposed building is anticipated to be exposed to aircraft noise levels below 65 dBA CNEL.

3.11.3 Thresholds of Significance

Thresholds used to evaluate potential noise impacts are based on CEQA Guidelines Appendix G. A significant noise impact could occur if implementation of the proposed project would:

1. Generate 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;

2. Generate excessive ground-borne vibration or ground-borne noise levels; or

3. 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, expose people residing or working in the project area to excessive noise levels.

3.11.3.1 Threshold 1: Increase in Ambient Noise Levels

In accordance with the City's 2022 CEQA Significance Determination Thresholds (City 2022) and San Diego Municipal Code, an increase in noise levels during construction would be considered significant if construction noise levels would exceed 75 dBA L_{EQ} during the 12-hour period from 7:00 a.m. to 7:00 p.m. at a property zoned residential. This threshold provides a reasonable balance between the need to operate noise-generating equipment for most temporary construction activities and the desire to protect NSLUs from temporary disturbances.

A significant impact related to proposed stationary noise sources (not including temporary construction equipment) would occur if the sources would generate noise levels at the property line that exceed the limits contained in the City's Noise Ordinance (provided in Table 3.11-3 of this report).

According to the City's 2022 CEQA Significance Determination Thresholds (City 2022), a significant impact related to traffic-generated noise would occur if exterior noise levels exceed 65 dBA CNEL at residential, school, library, hospital, daycare, hotel/motel, park, or convalescent home land uses; 70 dBA CNEL at offices, churches, businesses, or other professional uses; or exceed 75 dBA CNEL at commercial, retail, industrial, or outdoor spectator sport land uses. Where these noise levels are already exceeded, a significant impact would occur if the project would result in a 3 dB increase.

3.11.3.2 Threshold 2: Ground-Borne Vibration

A significant vibration impact may occur if construction of the proposed project would subject vibration-sensitive land uses to construction-related ground-borne vibration that exceeds the threshold of 0.25 inch per second (in/sec) peak particle velocity (PPV) for potential architectural damage to historic structures for continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment), as specified by Caltrans (2020).

3.11.3.3 Threshold 3: Airport Noise Exposure

Excessive noise exposure is defined as noise levels that exceed the ALUCP noise compatibility limit for the associated land use. It is also noted that the District's future interior noise goal is to reduce interior noise levels below 35 dB in classrooms and below 40 dB in shared spaces (refer to Section 3.11.2.4). However, this District goal is not used as a threshold of significance for this analysis as the regulatory standard is established in the Noise Element of the City's General Plan (refer to table 3-11-2). For the project's academic land use, excessive noise is defined as greater than 45 dBA L_{EQ} [1] for interior classroom spaces per City standards.

3.11.4 Impact Analysis

3.11.4.1 Increase in Ambient Noise Levels

Threshold 1: Would the project generate 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?

Impact Discussion

Construction

Construction would require the use of equipment throughout the site for the full term of construction. General project construction activities would include site preparation, grading, installation of underground utilities, physical building construction, paving, and architectural coatings. The most prominent noise-generating standard construction equipment anticipated to be used on the site

[1] For classroom uses where sleep is not a factor, the CNEL is not used. The daytime noise level (L_{EQ}) is used here.

includes dozers, dump trucks, loaders, excavators, concrete saws, graders, backhoes, cement and mortar mixers, pavers, rollers, cranes, forklifts, generators, and air compressors.

In accordance with the City's 2022 CEQA Significance Determination Thresholds, an increase in noise levels during construction would typically be considered a significant impact if construction noise levels would exceed 75 dBA L_{EQ} (12-hour) at a property zoned residential. The Municipal Code specifies that construction noise shall not exceed 75 dBA L_{EQ} (12-hour) at a residentially zoned property between 7:00 a.m. and 7:00 p.m.

The properties immediately adjacent to the proposed project site are not residential land uses. The closest residential-zoned property is the AMLI Aero residential development approximately 1,300 feet to the south. Using the RCNM to calculate typical construction equipment, the combined use of a dozer and grader would generate 82.7 dBA L_{EQ} at 50 feet. At 1,300 feet this would attenuate to 54.4 dBA L_{EQ}, well below the 75 dBA L_{EQ} (12-hour) threshold. Although it is not zoned residential, the nearby Four Points by Sheraton hotel would be approximately 700 feet from project construction activity. At these distances, the dozer and grader would generate noise levels of 59.8 dBA L_{EQ}, which is below the threshold of 75 dBA L_{EQ} (12-hour). As such, **temporary noise impacts would be less than significant**. No mitigation is required.

Operation

The San Diego Municipal Code establishes property line noise limits for stationary sources based on land use. The nearest noise sensitive land uses would be the hotel to the south. Based on the Zoning and Parcel Information Portal (City 2026), the hotel, along with the project site and MYF are considered "unzoned". For the purposes of this analysis, a commercial zone noise limit is applied for the hotel: 65 dBA L_{EQ} from 7:00 a.m. to 7:00 p.m., 60 dBA L_{EQ} from 7:00 p.m. to 10:00 p.m., and 60 dBA L_{EQ} from 10:00 p.m. to 7:00 a.m. (see Table 3.11-3). The other nearby land uses across SR 163 are zoned commercial.

HVAC

The location of future HVAC systems and other mechanical equipment required for buildings is not known at this time. Therefore, a standard rooftop commercial HVAC unit manufactured by Carrier is used in this analysis to predict the potential for HVAC-related noise effects. A 20-ton unit (the loudest of this model) has a sound power level of 86.5 dBA, which equates to a sound pressure level of approximately 78.5 at 1 meter (3 feet) for a unit mounted on a reflective surface (Carrier 2024). It is anticipated that this unit would be mounted on the building rooftop; however, to be conservative, no parapets or other mechanical screening materials are considered in this analysis. Noise levels would attenuate below the City's nighttime commercial property line limit of 60 dBA L_{EQ} at a distance of approximately 30 feet. Although the precise location of the HVAC unit within the project building is not known at this time, it is not anticipated to be installed within 30 feet of neighboring properties. **Noise generated by the project's HVAC units would be less than significant**.

Test Engine

Noise generated by the aviation classes' outdoor uses would include the operation of a portable test engine and airplane propellers twice a week. Engine tests are currently conducted at the existing instructional facility on the project site; however, the project would construct an engine testing pad at a fixed location and would allow for an increase in the frequency of tests each week. The test engine

would be periodically moved to an engine testing pad and tested up to an hour each day. This pad would be located approximately 215 feet northwest of the hotel property to the south, which is the nearest applicable property line. Noise levels measured from these existing operations were 85.6 L_{EQ} at a distance of 135 feet. At 215 feet, noise would be approximately 79.4 L_{EQ}. This would exceed the City's commercial limit of 65 dBA L_{EQ} during daytime hours when the engines are anticipated to be running. Impacts from **operation of the test engine would be significant prior to mitigation**.

Off-site Transportation Noise

According to the City CEQA Thresholds, a significant impact related to traffic-generated noise would occur if the project-generated traffic noise would increase overall traffic noise levels by 3 dB CNEL or more, when existing exterior noise levels exceed 65 CNEL at residential, school, library, hospital, daycare, hotel/motel, park, or convalescent home land uses; 70 CNEL at offices, churches, businesses, or other professional uses; or exceed 75 CNEL at commercial, retail, industrial, or outdoor spectator sport land uses.

The project would generate vehicular traffic in the project vicinity and has the potential to increase traffic noise levels along nearby roadways. The project is expected to generate a net increase of 222 daily trips compared to existing conditions. TNM software was used to calculate noise levels at various receptors for the opening year and opening year plus project conditions along the affected roadways. Refer to Appendix H for additional information. Traffic noise levels along roadway segments with the addition of project-generated traffic would increase by up to 0.2 CNEL. This would be far below a perceptible change (3 CNEL) in traffic noise levels and the City's traffic noise threshold would not be exceeded. **Impacts related to traffic noise would be less than significant**.

Mitigation Measures

As test engine operations associated with the proposed project would generate noise levels exceeding the assumed commercial limits of 60 dBA L_{EQ} at the nearby hotel property lines, potentially significant impacts would occur. Implementation of mitigation measure NOI-1 would be required to reduce impacts from engine noise to a less than significant level.

NOI-1 **Test Engine Noise Level Reduction Measures.** Noise levels generated by the project's test engines shall not exceed the City's limits stated in Table K-4 of San Diego Municipal Code §59.5.0401. Noise levels from engine testing shall not exceed 65 dBA L_{EQ} from 7:00 a.m. to 7:00 p.m., 60 dBA L_{EQ} from 7:00 p.m. to 10:00 p.m., and 60 dBA L_{EQ} from 10:00 p.m. to 7:00 a.m. when measured at the nearby hotel to the south. Testing for individual engines shall be restricted to 30 minutes within a given hour during the daytime hours between 7:00 a.m. and 7:00 p.m. Engine testing shall not occur outside of these hours.

Noise levels shall be reduced by installing a barrier or acoustical louver between the engine and nearby property lines to achieve the minimum insertion loss necessary to achieve the noise levels above.

The barriers shall fully obstruct line of sight to off-site receptors and be at least one foot taller than the engine. To effectively reduce noise levels, the barrier should be constructed with no gaps or perforations and of a material to sufficiently reduce noise levels, such as concrete masonry.

Noise attenuation features or a sufficient demonstration that noise levels would not exceed the limits set by the San Diego Municipal Code shall be included on construction plans to ensure compliance and submitted to the District for approval. The acceptability of the predicted insertion loss shall be verified in writing by the project's mechanical engineer, acoustical consultant, or an engineer employed by the manufacturer of the louver.

A mechanical schedule and louver details documenting noise-reduction measures shall be included in the project plans to ensure compliance with this noise limit and shall be prepared by the project applicant and submitted to the District for approval prior to DSA approval.

Level of Significance After Mitigation

With implementation of mitigation measure NOI-1, noise levels from testing and operation of the test engine would be reduced to **less than significant** levels.

3.11.4.2 Ground-Borne Vibration

Threshold 2: Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Impact Discussion

Construction Vibration

During construction and demolition, the greatest potential source of vibration during project construction is anticipated to be a vibratory roller, primarily used to achieve soil, aggregate, and asphalt compaction. Demolition work would include the use of a skid steer, excavator, front end loader, concrete saw, forklift, and scissor lift. These equipment types are not anticipated to generate substantial vibration. Vibratory rollers may be used in the construction of paved areas and tarmac. Existing hangars located north of the project are designated as historic (City 2025) and would be subjected to construction vibration. A large vibratory roller is assumed to generate a vibration level of approximately 0.210 in/sec PPV at a distance of 25 feet (Caltrans 2020). If vibratory rollers are required within 22 feet of the hangar to the north, an exceedance of the 0.25 in/sec PPV vibration criteria for potential architectural damage to historical structures may occur[2]. Vibratory rollers are anticipated to be used for building foundations and parking areas, both of which would be beyond 22 feet from the nearest hangar. However, because exact locations of construction equipment may vary depending on site conditions during demolition and construction, this analysis assumes that the potential for architectural damage to historic buildings may occur. **Impacts would be significant prior to mitigation**.

Operational Vibration

Academic uses of the site would not introduce substantial vibration-generating equipment to the project site. The project would not expose people to excessive groundborne vibration or noise and **impacts would be less than significant**.

[2] Equipment PPV = Reference PPV * $(25/D)^n$ (in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2020.

Mitigation Measures

To reduce construction vibration at the vibration-sensitive hangar north of the project, mitigation measure NOI-2 would be required.

NOI-2 Construction Vibration Limits Near Historic Structures. Vibration-generating construction equipment shall not generate vibration levels that exceed 0.25 in/sec PPV at historic structures. This shall be demonstrated by ensuring that construction plans associated with the project, prior to District and City approval, specify that large vibratory rollers are to be set back from historic structures by 22 feet or be used in static mode only (no vibrations) when operating within 22 feet of historic structures. If vibration-generating equipment other than large vibratory rollers is used during construction, project construction plans shall include specifications that demonstrate that vibration limits do not exceed 0.25 in/sec PPV at the historic structure.

Level of Significance After Mitigation

With implementation of mitigation measure NOI-2, the potential for architectural damage to historic buildings to occur during project construction would be reduced to **less than significant** levels.

3.11.4.3 Airport Noise Exposure

Threshold 3: 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?

Impact Discussion

The project site is not within the 60 dBA CNEL (or greater) noise contours of the MYF airport as shown in the ALUCP (SDCRAA 2010). However, based on the forecast noise contours for the Draft AMP (City 2025), the proposed building is anticipated to be exposed to aircraft noise levels below 65 dBA CNEL. Table III-1 of the ALUCP defines the noise compatibility standards for classrooms, offices, and related indoor uses of adult schools, colleges, and universities. These uses are conditionally compatible with noise exposure levels between 60 and 70 dBA CNEL if the building structure is capable of maintaining interior noise levels of 45 dBA L_{EQ}. Outdoor uses are acceptable, though some noise interference may occur (SDCRAA 2010).

The project proposes to continue and expand existing aviation classes occurring at the project site. The nature of these courses means that academic instruction would take place in both indoor and outdoor environments at the project site. Due to the nature of the outdoor classes, noise interference from airport noise is expected and would be compatible with this use. Indoor classrooms, however, would be required to attenuate indoor noise to 45 dBA L_{EQ} per City standards. Because elevated noise levels in the outdoor noise environment could occur at the building façades, maintaining this interior noise level is not guaranteed with standard construction materials. Impacts related to airport noise exposure would be **potentially significant prior to mitigation**.

Mitigation Measures

As the project would be exposed to airport-related noise levels of 60 to 65 dBA CNEL, required interior noise levels may not be achieved. Implementation of mitigation measure NOI-3 is required to reduce impacts from aircraft noise exposure to a less than significant level.

NOI-3 Classroom Building Exterior-to-Interior Noise Limits. Once specific building plan information is available, an exterior-to-interior analysis shall be performed for interior classrooms within the project building. The exterior-to-interior analysis shall demonstrate that interior noise levels do not exceed 45 dBA L_{EQ}. The information in the analysis shall include wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on any other openings in the building shell. With this specific building plan information, the analysis shall determine the predicted interior noise levels for the planned classroom spaces. If predicted noise levels are found to exceed 45 dBA L_{EQ}, the analysis shall identify architectural materials or techniques that could be included to reduce noise levels to 45 dBA L_{EQ}. Standard measures such as glazing with appropriate Sound Transmission Class (STC) ratings, as well as walls with appropriate STC ratings, should be considered. Final plans shall demonstrate that interior noise levels do not exceed 45 dBA L_{EQ} for proposed classroom areas.

Significance of Impacts After Mitigation

With implementation of mitigation measure NOI-3, interior noise levels would be reduced to compatible levels. Impacts would be reduced to a level that is **less than significant**.

3.11.5 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to noise is limited to the area directly surrounding the project site, as noise and vibration attenuate quickly with distance and only have the potential to combine with other sources in the immediate vicinity.

3.11.5.1 Increase in Ambient Noise Levels

Cumulative projects in the vicinity of the project site, including within the MYF property, could involve construction activities or new permanent sources of noise which would have the potential to combine with project-related noise sources and result in a substantial increase in ambient noise levels in the vicinity. As described in Section 3.11.4.1 above, noise associated with construction of the project would be less than significant. In addition, a construction noise permit from the City would be required for cumulative projects anticipated to conflict with construction noise limits or result in work outside of the typically allowed hours of construction. The permit would provide conditions for the construction work that limit its potential for excessive noise generation, and cumulative construction noise impacts would be less than significant.

New stationary sources of noise associated with the land uses that surround the project site are not anticipated to substantially increase noise levels in combination with project noise sources. Surrounding cumulative projects would be subject to the San Diego Municipal Code property line limits that are established to provide an appropriate noise environment based on the applicable land uses. In addition, mitigation measure NOI-1 requires noise level reduction measures related to the engine testing activity to reduce these noise levels to below a level of significance. As the project and future cumulative development projects would be required to adhere to noise limits for stationary sources, the cumulative

impact from these sources is considered less than significant. The PEIR prepared for the AMP (City 2025) determined that traffic noise impact would be less than significant, while the PEIR prepared for the Kearny Mesa Community Plan Update (City 2020) determined that traffic noise impacts would be significant and unavoidable. However, project impacts related to an increase in traffic noise would be less than significant and would not be of a level to combine with other cumulative projects to produce a significant increase in traffic noise levels. Overall, the project's contribution to a significant cumulative increase in ambient noise levels **would not be cumulatively considerable**.

3.11.5.2 Ground-Borne Vibration

Cumulative projects in the vicinity of the project could involve construction activities that require vibration-generating equipment similar to the project; however, vibration attenuates rapidly with distance. Equipment generating substantial vibrations would need to be used concurrently and within very close proximity to a single vibration-sensitive receptor to result in a cumulative impact to that receptor. As cumulative projects would occur outside of the project site and the project would implement mitigation measure NOI-2 to reduce vibration impacts on the historic structures to the north of the site, it is not anticipated that a cumulative project together with the project could combine to result in a significant vibration impact. In addition, there are no substantial sources of operational vibration anticipated to be generated by the project; therefore, the project would not contribute to cumulative impacts related to vibration. Overall, cumulative ground-borne vibration impacts **would not be cumulatively considerable**.

3.11.5.3 Airport Noise Exposure

As discussed in Section 3.11.4.3, the project site could be exposed to airport noise levels between 60 and 65 dBA CNEL, and implementation of mitigation measure NOI-3 is required to reduce impacts from airport noise to a less than significant level. Similarly, cumulative development projects located within the MYF noise contours would be required to comply with the noise compatibility standards established in the ALUCP for MYF. Therefore, impacts related to airport noise exposure **would not be cumulatively considerable**.

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3.12 Public Services

This section addresses the potential public services impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to public services are also addressed.

3.12.1 Environmental Setting

Fire Protection

Fire protection services to the project site and Montgomery-Gibbs Executive Airport (MYF) are provided by the San Diego Fire-Rescue Department (SDFD). The SDFD serves a total area of approximately 343 square miles, including 17 miles of coastline extending three miles offshore, and a population of approximately 1.42 million people. The SDFD has a current total of 52 fire stations and nine permanent lifeguard stations, and employs 949 uniformed personnel, 98 permanent uniformed lifeguards, and 246 civilian personnel. In addition to fire protection services, the SDFD also provides emergency medical services (City of San Diego [City] 2026a).

Fire protection services to the project site are provided by Fire Station 28, located at 3880 Kearny Villa Road, adjacent to MYF. Fire Station 28 is directly across Kearny Villa Road from the project site, at a distance of less than 0.1 mile. Fire Station 28 was originally built in 1958 and serves the Kearny Mesa community, MYF, and surrounding areas, totaling approximately 7.76 square miles. This station provides fire protection and advanced life support services and includes a fire engine, aerial truck, water tender, and a foam truck. Fire Station 28 is also responsible for testing the pumping capacity of each new fire engine before it is placed into a station (City 2026b).

Police Protection

The District provides its own police services for its campuses through the District Police Department. The District Police Department is a Peace Officer Standards and Training certified, full-service police agency operating in compliance with applicable state standards under California Penal Code Section 13522. District Police Department officers are authorized by California Penal Code Section 830.32 and California Education Code Section 72330 with law enforcement authority that extends to any place in the state while performing their primary duty, consistent with the authority of municipal law enforcement officers. The District Police Department employs approximately 40 officers who provide the primary law enforcement response on and around District properties and coordinate with the City of San Diego Police Department, operating under a memorandum of understanding regarding responsibilities to respond to and investigate crimes on or adjacent to District properties (District 2025).

The District Police Department is headquartered at 1536 Frazee Road. According to the District Police Department Policy Manual (District Police Department 2026), calls are dispatched based on the following priority levels and allotted response thresholds:

- Priority 1 calls, defined as those involving life or death situations, serious crimes in progress, and/or imminent injury, should be dispatched within 5 minutes.

- Priority 2 calls are defined as emergency calls that are non-life threatening. All priority 2 calls should be dispatched within 30 minutes.

- Priority 3 calls are non-emergency calls where there is no immediate or potential threat to life or property, including cold reports, service calls and officer self-initiated activity. Priority 3 calls should be handled as soon as practicable.

The San Diego Police Department (SDPD) provides police services including patrol, traffic, investigative, records, laboratory, and support services to the City. Although the project site would be patrolled by District Police Department, the SDPD has jurisdiction over the MYF property, which is patrolled by the Eastern Division of the SDPD. The Eastern Division serves the neighborhoods of Allied Gardens, Birdland, College East, College West, Del Cerro, Grantville, Kearny Mesa, Lake Murray, Mission Valley East, Qualcomm, San Carlos, Serra Mesa, and Tierrasanta (City 2026c). The Eastern Division Police Substation is located adjacent to the MYF at 9225 Aero Drive, approximately 1.2 miles east of the project site. The SDPD's Air Support Unit is also located at MYF. The Air Support Unit bases several helicopters out of MYF that are used for search and rescue, aerial security, and air support to patrol operations.

Schools

The project site is located within the San Diego Unified School District (SDUSD) service area. SDUSD is the second largest school district in California, serving more than 121,000 students in pre-school through 12th grade. SDUSD operates 117 traditional elementary schools, 9 K-8 schools, 24 traditional middle schools, 22 high schools, 49 charter schools, 13 atypical/alternative schools, and 5 additional program sites (SDUSD 2026a). The project site is located within the attendance boundaries for Wedgeforth Elementary School, located at 3443 Ediwhar Avenue; Taft Middle School, located at 9191 Gramercy Drive; and Kearny High School, located at 1954 Komet Way (SDUSD 2026b).

Parks

Parks located within a mile of the project site include: Cabrillo Heights neighborhood park, located at 8308 Hurlbut Street, and Lindbergh Park, located at 4141 Ashford Street. Cabrillo Heights neighborhood park is a developed park located 0.4 mile south of the project site, containing baseball fields, multi-purpose fields, and playgrounds. Lindbergh neighborhood park is a developed park located 0.7 mile northwest of the project site and contains basketball courts, a multi-purpose field, and a playground. Additionally, the Serra Mesa Community Park and Recreation Center is located a little over one mile to the southeast of the project site. This park provides basketball courts, softball fields, a multi-purpose field, a playground, and a tot lot (City 2026d).

Other Public Facilities

The San Diego Public Library operates 36 library branches throughout the City. The project site is located in Zone B (North/Downtown) of the City's Library Master Plan (City 2023). Zone B is anticipated to require the construction of approximately 50,000 square feet (SF) of additional library space to accommodate the population growth in this area anticipated through 2040. This additional library space is anticipated to be provided in a replacement University Community Library and a new library location in the Clairemont Mesa area (City 2023).

3.12.2 Regulatory Framework

A summary of state, District, and local regulations that pertain to public services is provided below. No federal or regional regulations regarding public services apply to the project.

3.12.2.1 State

Fire Protection

California Health and Safety Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code [CBC]), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire-suppression training. The state Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California. The code also includes topics such as fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions to protect and assist first responders, and industrial processes.

California Code of Regulations, Title 24

Part 2 of Title 24 of the California Code of Regulations (CCR) refers to the CBC which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 2 is preassembled with the 2024 International Building Code (IBC) with necessary California amendments. Part 9 refers to the California Fire Code (CFC), which contains fire safety-related building standards referenced in other parts of Title 24.

Police Protection

Standardized Emergency Management System

California Government Code, Section 8607(a), directs the Governor's Office of Emergency Services to prepare a Standardized Emergency Management System program, which sets forth measures by which a jurisdiction should handle emergency disasters. The program is intended to effectively manage multi-agency and multijurisdictional emergencies in California. The Standardized Emergency Management System consists of five organizational levels, which are activated as necessary: (1) Field Response, (2) Local Government, (3) Operational Area, (4) Regional, and (5) State.

Local governments must use the Standardized Emergency Management System to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The City has adopted an Emergency Operation Plan that is consistent with the Standardized Emergency Management System, and the County has adopted the San Diego Operational Area Emergency Operations Plan, which is also consistent with the Standardized Emergency Management System (County 2022).

Schools

Proposition 1A

Proposition 1A, the Kindergarten-University Public Education Facilities Bond Act of 1998, or Senate Bill (SB) 50, was approved by voters in November 1998. This proposition provided $6.7 billion in general obligation bonds for K–12 public school facilities as well as the first funding for the new School Facility Program, which provides state funding assistance for new construction and modernization. This bill made major changes in the State School Facilities Program as well as developer fee mitigation for school districts in California. A primary result of SB 50 was the creation of different levels of developer fees. Specifically, the levy and collection of developer fees is governed by Education Code, Section 17620, and Government Code, Sections 65995 through 65998 and 66000 through 66008:

- Level 1 fees are the current statutory fees (also referred to as "Stirling Fees") allowed under Education Code, Section 17620.
- Level 2 fees are outlined in California Government Code, Section 65995.5, and allow school districts to impose higher fees on residential construction if certain conditions are met. This level of developer fees is subject to a School Facility Needs Analysis based on Government Code, Section 65995.6.
- Level 3 developer fees are outlined in Government Code, Section 65995.7, and may be implemented by a district if the state certifies that there is no money available for facilities.

Senate Bill 50/CA Government Code Section 65995

SB 50 was signed into law in 1998, imposing limitations on the power of cities and counties to require mitigation of school facilities' impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at a higher rate for residential development than previously allowed. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by law (Education Code Section 17620 or Government Code Sections 65970, et seq.) may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property.

3.12.2.2 District

District Design Guidelines and Standards Manual

The District Design Guidelines and Standards Manual includes various District policies for the design and construction of new facilities related to fire protection. The Project Programming section requires each project to include a detailed Fire Accessibility Plan that meets Division of the State Architect (DSA) standards by showing fully dimensioned fire department access routes, all fences and gates along those routes, and the locations of hydrants, valves, fire department connections, and sprinkler risers, along with identification of the hydrants used for fire-flow testing and the required approval stamp from the local fire authority. The Interior Finishes section establishes fire-safety and code-compliance standards requiring all interior finishes to meet CBC flame-spread and smoke-development limits, with Class A-rated wall and ceiling materials in egress corridors, stairways, and assembly areas, and chemically resistant finishes in instructional and lab spaces. Lastly, the Site Design section specifies that all fire access roads must comply with the requirements of CBC Title 24, Part 9, Appendix D.

San Diego Community College District Board Policies

Board Policy 7600 establishes a campus police department under the supervision of a Chief of Police who reports directly to the District Executive Operations Officer. The primary purpose of the District Police Department is to enforce the law on or near District campuses and properties. This Board Policy notes that public safety services must adhere to principles of diversity, equity, inclusion, and accessibility, and shall advance access to education by creating safe, secure, peaceful, and inclusive campus environments. In cooperation with the Chief of Police, the Chancellor is authorized to issue other regulations necessary for the administration of the police department.

3.12.2.3 Local

City of San Diego Municipal Code

The City requires payment of Development Impact Fees to collect a proportional fair share cost of capital improvements needed to offset the impact of the development (San Diego Municipal Code Section 142.0640). Development Impact Fees are based on community-specific financing plans completed when Community Plans are updated. Financing plans were formerly known as Public Facilities Financing Plans and are now referred to as Impact Fee Studies. The Impact Fee Studies set community-level priorities for facility financing and ensure that new development pays it proportionate fair share of public facilities costs through the payment of Development Impact Fees. Public educational facilities, including community colleges, are generally exempt from municipal Development Impact Fees, which are designed to offset the impacts of private residential and commercial development on infrastructure (such as parks, libraries, and mobility networks).

City of San Diego General Plan

Public Facilities, Services, and Safety Element

The General Plan Public Facilities, Services, and Safety Element (City 2024) includes a number of policies that address the financing, development, and management of public facilities and infrastructure, including transportation, storm drains, parks and recreation, fire-rescue, police, and libraries.

Police Protection

As specified in the General Plan, Public Facilities, Services, and Safety Element, Policy PF-E.2, the City goal is to maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within 7 minutes
- Priority 1 Calls (serious crimes in progress) within 12 minutes
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes
- Priority 4 Calls (minor requests for police service) within 90 minutes

Fire Protection

The SDFD has an active program that promotes the clearing of canyon vegetation away from structures in accordance with San Diego Municipal Code Section 142.0412 and the SDFD's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on City property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the SDFD (per San Diego Municipal Code Section 142.0412[i] or a previously recorded entitlement requires a width more or less than the standard 100 feet). Other fire prevention measures include adopting safety codes and an aggressive brush management program. Citywide fire service goals, policies, and standards are located in the Public Facilities, Services, and Safety Element of the General Plan and the SDFD's Fire Service Standards of Response Coverage Deployment Study.

Response time standards are provided in the General Plan Public Facilities, Services, and Safety Element and summarized below (per Policy PF-D.1):

- To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas.
- To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
    - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to five medical patients at once.
    - This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8 minute drive time spacing for multiple units in the most populated areas.

3.12.3 Thresholds of Significance

Thresholds used to evaluate potential public services impacts are based on CEQA Guidelines Appendix G. A significant public services impact could occur if implementation of the proposed project would:

1. 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

3.12.4 Impact Analysis

3.12.4.1 Public Services

Threshold 1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facility, 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?

Impact Discussion

Fire Protection

SDFD Fire Station 28 is located directly across Kearny Villa Road, less than 0.1 mile from the project site. Implementation of the proposed project could generate a slightly increased demand for fire and life safety services. The proposed project would replace an existing structure with an updated and expanded building which would allow for more classroom sessions at the site. While there would be more classroom sessions occurring, and thus, more students present, response to calls to the project site for emergency fire and life safety service by SDFD Station 28 would be comparable to existing response times and would provide adequate service to the project site. Given the site's location adjacent to the existing fire station and the minor increase in educational activities expected as a result of the project, the project would not require the construction of new fire facilities. Thus, the project would not result in the need for new or altered fire protection facilities, the construction of which could result in a significant environmental impact, and impacts would be **less than significant**. No mitigation is required.

Police Protection

Implementation of the project would involve demolition of the existing structure and construction of a new upgraded instructional facility. These types of facilities are not anticipated to result in a substantial increase in the number of police calls for service compared to existing conditions. The District Police Department and SDPD would continue to provide police protection services to the project site and respond to emergency calls generated from the project site. The project would not result in the need for new or altered police facilities, the construction of which could result in a significant environmental impact, and impacts would be **less than significant**. No mitigation is required.

Schools

The project does not include a residential component and would not result in a substantial permanent increase to the local population. Although the project could temporarily increase the number of people working at the site during the construction period, it is expected that these workers would already be residing in the region, it is not anticipated that these workers would permanently relocate their families to the area due to the limited and temporary nature of this work. The project would not house residents with school-age children nor generate a substantial number of jobs that would have people relocating to the project vicinity from another area. For these reasons, the project would not increase the demand for school services in the area, and impacts resulting from new school facilities or expansions of existing school facilities would be **less than significant.** No mitigation is required.

Parks

The project does not include a residential component and would not result in a substantial permanent increase to the local population. Although the project could temporarily increase the number of people working at the site during the construction period, it is expected that these workers would already be residing in the region, and it is not anticipated that these workers would permanently relocate to the area due to the temporary nature of this work. The project would not house residents nor generate a substantial number of jobs that would have people relocating to the project vicinity from another area. For these reasons, the project would not increase the demand for parks in the area. The project would not require the construction of new or altered park facilities which could result in a significant environmental impact, and impacts would be **less than significant**. No mitigation is required.

Other Public Facilities

As described above, the project does not include a residential component and would not result in a substantial permanent increase to the local population. Although the project could temporarily increase the number of people working at the site during the construction, it is expected that these workers would already be residing in the region, and it is not anticipated that these workers would permanently relocate to the area due to the temporary nature of this work. The project would not contribute to a population increase in the area. Therefore, the project would not result in an increase demand for new or altered public, the construction of which could result in a significant environmental impact, and impacts would be **less than significant**. No mitigation is required.

3.12.5 Cumulative Impact Analysis

3.12.5.1 Fire Protection Services

The geographic scope of public services is the Kearny Mesa Community Plan area, which contains the local public service stations, patrols, schools, parks, and library branches that would serve the project site. The Kearny Mesa Community Plan Update Program Environmental Impact Report (City 2020) identified significant and unavoidable cumulative impacts associated with public services. As discussed above, however, implementation of the proposed project would not substantially increase the need for fire/life safety services over existing conditions. The project site would continue its existing use as the aviation classroom, although more classroom sessions would be offered based on the improved facility. Given the project site's close proximity to Fire Station 28 and the continued use of the project site as the Montgomery Field Aviation Classroom, the project would **not contribute to a significant cumulative fire protection service impact**.

3.12.5.2 Police Protection, Schools, Parks, and Other Public Facilities

Implementation of the proposed project would not increase the population or result in the need for additional police protection services, parks, schools, or other public facilities that could result in physical changes to the environment. Therefore, the project would **not contribute to cumulative impacts associated with police protection, schools, parks, or other public facilities**.

3.13 Transportation

This section addresses the potential transportation impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to transportation are also addressed. This section relies on the information and analysis in the Local Mobility Analysis (Linscott, Law & Greenspan, Engineers [LLG] 2026a) and the Vehicle Miles Traveled (VMT) Screening Memorandum (LLG 2026b), provided as Appendix I and Appendix J to the EIR, respectively.

3.13.1 Environmental Setting

The project site is located on the Mongomery-Gibbs Executive Airport (MYF), which is in an urbanized area connected by a network of local roadways, highways, and multimodal transportation options. Highways in the vicinity include Interstate (I-) 805 and State Route (SR) 163 to the west, I-15 to the east, I-8 to the south, and SR 52 to the north. Vehicular access to the project site is provided by a gated driveway located on the east side of Kearny Villa Road. Parking is provided to the south of the existing Miramar Hangar in an unpaved gravel area. Bus service is provided by the Metropolitan Transit System (MTS). The circulation network is described in further detail below.

3.13.1.1 Roadway Network

The existing roadways described below are those that accommodate the majority of existing trips associated with the project site. Their existing and planned configurations are described below.

- **Kearny Villa Road** is classified as a four-lane Major Arterial in the Kearny Mesa Community Plan. Kearny Villa Road is currently constructed as a four-lane undivided roadway with a two-way left-turn lane. On-street parking is not permitted. The posted speed limit is 45 miles per hour.

- **Aero Drive** is classified as a four-lane Major Arterial in the Kearny Mesa Community Plan. Aero Drive is currently constructed as a four-lane divided roadway. On-street parking is not permitted. The posted speed limit is 40 miles per hour.

3.13.1.2 Transit Network

The existing public transit network accessible to and from the project site consists of bus service operated throughout San Diego County (County) by MTS. The nearest bus stop is located approximately 0.2 miles south of the project site on the southwest corner at the Kearny Villa Road and Aero Drive intersection. The bus routes serving the immediate project area include MTS Routes 25 and 120 which are discussed further below:

- **Route 25** runs between the Fashion Valley Transit Center and the Kearny Mesa Transit Center. The route runs along SR 163, Aero Drive, and Clairemont Mesa Boulevard. Weekday service begins at 4:47 a.m. with 30-minute headway until 10:01 p.m. This route does operate on the weekend. Saturday service begins at 6:30 a.m. with 1-hour headway until 9:29 p.m. Sunday service begins at 8:30 a.m. with 1-hour headway until 6:28 p.m.

- **Route 120** runs between the Kearny Mesa Transit Center and 4th Avenue and B Street. The route runs along Kearny Villa Road, Linda Vista Road, Friars Road, SR 163, 4th Avenue, and 5th Avenue. Weekday service begins at 4:59 a.m. with 30-minute headway until 11:53 p.m. This route does

operate on the weekend. Saturday service begins at 5:45 a.m. with 30-minute headway until 10:29 p.m. Sunday service begins at 6:13 a.m. with 1-hour headway until 9:59 p.m.

3.13.1.3 Pedestrian and Bicycle Network

Sidewalks are provided on both sides of Kearny Villa Road south of Aero Drive in the vicinity of the project site. In addition, sidewalks are provided along Kearny Villa Road north of Aero Drive for approximately 1,000 feet along the west side and 350 feet along the east side. Beyond these distances, the area on either side of Kearny Villa Road is comprised of a decomposed granite path, including along the project frontage. In addition, sidewalks are provided on both sides of Aero Drive within the vicinity of the project site. The nearest signalized intersection is located at the Kearny Villa Road and Aero Drive intersection which provides a controlled crossing location with pedestrian push buttons and crosswalks.

The existing bicycle network in the project vicinity includes Class II bicycle lanes along both sides of Kearny Villa Road and Aero Drive. According to the City of San Diego (City) Bicycle Master Plan (City 2013), no upgrades to bicycle facilities are planned along Kearny Villa Road or Aero Drive within the vicinity of the project site. Pedestrian and bicycle facilities planned in the Kearny Mesa Community Plan in the vicinity of the project site include a cycle track and multi-use path along Kearny Villa Road and Aero Drive (City 2020).

3.13.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to transportation is provided below.

3.13.2.1 Federal

Americans with Disabilities Act of 1990

The Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications. Numerous standards and guidance documents have been developed to facilitate the proper implementation of the ADA. The Department of Justice ADA Title III Regulation 28 Code of Federal Regulations (CFR) Part 36 prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with the accessibility standards established by this part. The regulation includes Standards for Accessible Design in Appendix A of 28 CFR of Part 36, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

3.13.2.2 State

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, changing the way transportation impact analysis is conducted under CEQA. Within the CEQA Guidelines, these changes include elimination of auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant transportation impacts. In December 2018, new CEQA Guidelines implementing SB 743 (CEQA Guidelines Section 15064.3), along

with the Governor's Office of Planning and Research (OPR; now Governor's Office of Land Use and Climate Innovation) Technical Advisory on Evaluating Transportation Impacts for CEQA, were finalized and made effective. CEQA Guidelines Section 15064.3, and the associated Technical Advisory, provide that use of automobile VMT is the preferred CEQA transportation metric, and correspondingly eliminate auto delay/level of service as the metric for assessing significant transportation impacts under CEQA. Statewide application of the VMT metric was required beginning on July 1, 2020.

3.13.2.3 Regional

San Diego Association of Governments Regional Plan

SANDAG serves as the region's metropolitan planning organization and forum for decision-making on regional issues such as growth, transportation, land use, the economy, and the environment. The Regional Plan, updated every five years by SANDAG, incorporates state requirements for a Regional Comprehensive Plan, Regional Transportation Plan (RTP), and Sustainable Communities Strategy (SCS). The 2025 Regional Plan continues the land use strategy of focusing future growth within the existing urbanized areas of the region, particularly in the western portion of the County along major transit corridors, to support transit use, walking, and bicycling. The 2025 Regional Plan focuses on reducing greenhouse gas (GHG) emissions through a combination of land use planning, expanded transit infrastructure, active transportation networks, and the implementation of transportation demand management strategies, including roadway pricing. The 2025 Regional Plan includes a long-range planning horizon to approximately 2050 and identifies a comprehensive set of transportation improvements and policies intended to accommodate projected regional growth while supporting state climate and sustainability goals.

3.13.2.4 District

District Design Guidelines and Standards Manual

Design Guides and Standards

The District Design Guidelines and Standards Manual includes Section 2.1.11, which addresses accessibility planning requirements applicable to campus development. These guidelines require site-specific ADA plans that identify accessible routes, parking areas, curb ramps, building entrances, and other key features that support pedestrian circulation and access throughout campus facilities. These standards provide a framework for maintaining and improving accessibility as part of future development.

3.13.2.5 Local

City of San Diego General Plan

The City's General Plan establishes policies to develop a balanced, multimodal transportation system that supports walking, bicycling, transit, and vehicular travel. The Mobility Element emphasizes complete streets principles, prioritizes transit and active transportation infrastructure, and seeks to reduce dependence on single-occupancy vehicles. The General Plan promotes the integration of land use and transportation planning to improve accessibility and mobility throughout the City, including within the Kearny Mesa area.

Kearny Mesa Community Plan Mobility Element

The Kearny Mesa Community Plan guides land use and circulation within the Kearny Mesa community. The Mobility Element establishes a multimodal circulation system within the community plan area that is built around Complete Streets, expanded transit priority corridors, and a connected bikeway network to reduce VMT and support the community's employment-focused land use pattern. It reclassifies major arterials to incorporate transit-only lanes, enhanced pedestrian zones, and protected cycling facilities, while integrating future high-capacity transit investments and mobility hubs. Specific roadway, pedestrian, and bicycle infrastructure improvements identified for the community plan area are identified in Section 3.13.1.

City of San Diego Transportation Study Manual

The City's Transportation Study Manual (TSM) provides guidance for evaluating transportation impacts for projects within the City's jurisdiction in accordance with SB 743. The TSM establishes VMT as the primary performance metric for assessing transportation impacts under CEQA and outlines screening criteria, thresholds of significance, and methodologies for VMT analysis. The TSM also provides the criteria for preparation of a Local Mobility Analysis to evaluate site access, circulation effects outside the scope of CEQA, and potential effects on the surrounding multimodal transportation network, including pedestrian, bicycle, and transit facilities.

3.13.3 Thresholds of Significance

Thresholds used to evaluate potential transportation impacts are based on CEQA Guidelines Appendix G. A significant transportation impact could occur if implementation of the proposed project would:

1. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);

3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

4. Result in inadequate emergency access.

3.13.4 Impact Analysis

3.13.4.1 Circulation Programs, Plans, Ordinances, and Policies

Threshold 1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impact Discussion

Roadway Facilities

The generation of vehicular traffic during construction could result in temporary vehicle delays; however, such delays would be brief and infrequent and are not anticipated to substantially alter traffic

circulation in the project vicinity. Staging for project construction would occur within the project site and is not expected to impede vehicle circulation in the area. Temporary changes to the circulation system would occur during some phases of project construction as connections to utilities in Kearny Villa Road are constructed. Specifically, the project would involve construction within City rights-of-way (ROW) to construct connections to existing utility infrastructure located in Kearny Villa Road for water and fire water service. These improvements would result in temporary lane closures along Kearny Villa Road. For work within City ROW requiring temporary transportation facility alterations or closures, the District would be required to obtain and comply with the condition of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan to ensure emergency access is maintained on City streets. Therefore, construction of the project would not conflict with policies related to circulation on roadways surrounding the project site.

Once operational, the project would not result in conflicts with a program, plan, ordinance, or policy addressing roadway facilities. The internal circulation enhancements proposed by the project, which would include re-paving the existing driveway east of Kearny Villa Road which would connect to the parking area south of the proposed hangar, would not result in conflicts with existing City plans as they would occur within the project site and would not alter off-site, public circulation.

Pedestrian, Bicycle, and Transit Facilities

As described above, construction of the project would require work within the City ROW of Kearny Villa Road. These improvements would result in temporary lane closures along Kearny Villa Road that could also alter pedestrian and bicycle routes along these roadways. However, work within this ROW would be subject to the Traffic Control Plan described above which would include requirements for safe pedestrian and bicycle passage. Therefore, the construction of the project would not conflict with MTS service along this roadway or pedestrian or bicycle facility use.

As discussed in Section 3.13.1 above, there are various planned transit, pedestrian, and bicycle facilities along Kearny Villa Road and Aero Drive in the vicinity of the project site. The project would involve construction within the boundaries of the project site and minor construction for utility connections within the City ROW, neither of which would preclude the City from implementing these planned improvements. Additionally, the project would provide accessible pathways throughout the project site to accommodate student and faculty access to the Miramar College AIC and associated parking and engine testing pad area consistent with the District Design Guidelines and Standards Manual. The proposed pedestrian improvements would be constructed with ADA-compliant curb ramps and high-contrast tactile warning strips (i.e., yellow truncated dome pads). Thus, the project would be consistent with the goals and policies of the District Design Guidelines and Standards Manual, Kearny Mesa Community Plan, and the City's General Plan Mobility Element as they relate to transit, pedestrian, and bicycle facilities.

Implementation of the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. **Impacts would be less than significant**. No mitigation is required.

3.13.4.2 Vehicle Miles Traveled

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact Discussion

Although the District is the Lead Agency under CEQA for the project, the project is proposed on City owned property. Therefore, it was determined that the proposed project should be evaluated using the criteria and thresholds outlined in the City's TSM. The TSM outlines various screening criteria based on project characteristics including, but not limited to, location in a VMT efficient area, size (generating less than 300 trips), and provision of affordable housing. According to the TSM, a project that meets at least one of the identified screening criteria would have less than significant VMT impact.

The project would result in approximately 15 additional weekly (3 per day) class sessions on the project site compared to existing conditions, with an average of 23 students attending each class session. With this increase in enrollment and class frequency, a typical weekday scenario conservatively assumes three additional classes in a day, with a maximum of 35 students and two instructors per class. The project trip generation conservatively assumes approximately 25 percent of daily trips would occur during the a.m. peak hour and 25 percent of the daily trips occur during the p.m. peak hour, even though existing traffic counts indicate that students and instructors typically arrive and depart outside of peak commuter periods. The project is expected to generate approximately 222 average daily trips (ADT) compared to existing conditions. See Appendix J for additional information. As the project would generate less than 300 ADT, it would qualify for the small project screening criteria identified in the City's TSM and would therefore be presumed to have a less than significant VMT impact. Implementation of the project would not result in a conflict or inconsistency with CEQA Guidelines Section 15064.3(b). **Impacts would be less than significant**. No mitigation is required.

3.13.4.3 Hazardous Design Feature

Threshold 3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Discussion

As described in Section 3.13.4.1, construction of the project would require temporary lane closures along Kearny Villa Road at the project frontage to construct utility connections. The work within this City ROW would be subject to City approval of a Traffic Control Plan as a condition of a Right-of-Way Permit, which would ensure construction document specifications include measures for appropriate signing, flagging, and directing of traffic. The implementation of these measures would ensure construction activities occurring in this roadway do not result in hazards to users of the circulation system.

Once operational, access to the project site would be provided via the existing MYF Gate 4 similar to existing conditions. This would provide vehicular access to the parking spaces located adjacent to the southern edge of the proposed hangar and the larger parking area located on the southern portion of the project site. All internal driveways within the project site would be constructed in accordance with applicable District standards, including specifications for fire access roads, parking design, accessibility, and vehicle circulation contained in the District Design Guidelines and Standards Manual. No change

from the institutional land use is proposed and the project would not introduce incompatible uses to the project site. Therefore, implementation of the project would not result in substantial increases in hazards due to a geometric design feature or incompatible uses. **Impacts would be less than significant**. No mitigation is required.

3.13.4.4 Emergency Access

Threshold 4: Would the project result in inadequate emergency access?

Impact Discussion

Roadways adjacent to the project site, including Kearny Villa Road, Aero Drive and I-5, would remain available for emergency evacuation (refer to Section 3.8, *Hazards and Hazardous Materials*, for additional discussion of evacuation routes). As discussed under Section 3.13.4.1 above, the project would involve work within Kearny Villa Road to construct connections to existing water and fire water utilities, which would require temporary lane closures. However, the District would be required to obtain and comply with the condition of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan to ensure emergency access is maintained on City streets. In addition, all internal driveways within the project site would be constructed in accordance with applicable District standards, including specifications for fire access road dimensions. In addition, the project would be required to maintain emergency access to the site in accordance with state building codes, including those that address fire truck lanes, hose pull distances, and security systems. Therefore, implementation of the project would not result in inadequate emergency access. **Impacts would be less than significant**. No mitigation is required.

3.13.5 Cumulative Impact Analysis

The study area for cumulative impacts related to circulation programs, plans, ordinances, and policies corresponds to the geographic extent of those documents, which generally encompasses the City. The study area for cumulative VMT impacts is also regional in nature and corresponds to the City. The study area for hazardous design features is local, focused on roadways adjacent to the project site, while the study area for emergency access is the City, reflecting the broader network of routes used by emergency responders.

3.13.5.1 Circulation Programs, Plans, Ordinances, and Policies

Cumulative development projects within the San Diego region would be required to demonstrate compliance with applicable circulation programs, plans, ordinances, and policies for the purpose of avoiding or mitigating environmental effects. Projects that are not consistent with these documents would require discretionary approvals, such as permits or plan amendments, and would be subject to environmental review under CEQA, through which potential conflicts and cumulative effects on the circulation network would be evaluated. Because the project would not conflict with circulation programs, plans, ordinances, or policies, its contribution to potential cumulative transportation impacts **would not be cumulatively considerable**.

3.13.5.2 Vehicle Miles Traveled

Cumulative development projects in the City would be required to comply with the City's Mobility Choices Ordinance (San Diego Municipal Code Section 143.1103 et seq.) and may require a VMT analysis in accordance with the City TSM. Projects that result in a significant VMT impact would be required to implement active transportation measures or pay the City's Active Transportation In Lieu Fee. Nonetheless, future projects in the City, especially those constructed in non-VMT-efficient areas, could result in a substantial increase in regional VMT and result in significant cumulative impacts. As the project was determined to qualify for the small project screening criteria (refer to Section 3.13.4.2 for additional information), it is presumed to have a less than significant VMT impact and the project contribution to cumulative VMT impacts **would not be cumulatively considerable**

3.13.5.3 Hazardous Design Feature

Construction of future cumulative development projects in the City could result in the construction of hazardous design features; however, no cumulative projects are reasonably anticipated to result in permanent changes to nearby roadways or areas near the project site. These projects would also be reviewed for compliance with City regulations related to roadways and adjacent land uses, which is anticipated to be sufficient to avoid substantial conflicts or hazards. In addition, as discussed in Section 3.13.4.3, implementation of the project would not include features that would create a hazardous condition. Therefore, cumulative impacts related to hazardous design features would be **less than significant**.

3.13.5.4 Emergency Access

Construction of future cumulative development projects in the City could result in interference with emergency access during temporary construction activities that block access routes. Once operational, such projects would also be required to provide permanent, adequate emergency access in accordance with state building codes. No cumulative projects are reasonably anticipated to result in permanent changes to the nearby highways and arterials such that existing emergency access would be eliminated. Development within the project site would not physically interfere with emergency access because the project would not include features that prevent continued emergency access. In addition, the project would be required to establish and maintain emergency access during construction in accordance with CBC requirements and in compliance with City Public Right-of-Way Permit conditions to ensure that emergency access is maintained during construction. Therefore, cumulative impacts related to emergency access would be **less than significant**.

3.14 Tribal Cultural Resources

This section addresses the potential tribal cultural resource impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to tribal cultural resources are also addressed. The analysis pertaining to tribal cultural resources is based on the negative results of an archaeological survey conducted at the project site, as documented in the project Cultural Resources Technical Report prepared by HELIX (2026), included as Appendix E to this EIR, and the tribal consultation process conducted for the project pursuant to Assembly Bill (AB) 52.

3.14.1 Environmental Setting

A tribal cultural resource is defined as a site, feature, place, or 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 may be considered significant if it is (1) listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources; or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code (PRC) Section 5024.1(c). Refer to Section 3.4, *Cultural Resources*, for further discussion regarding the existing cultural and historical setting of the project area, including a summary of the history of the Kumeyaay people.

To assess the existing tribal cultural conditions on the project site, HELIX contacted the Native American Heritage Commission (NAHC) for a Sacred Lands File search and a list of tribal contacts for the project area. The NAHC indicated that the results of the search were positive and to contact the Viejas Band of Kumeyaay Indians for more information. Letters were sent on March 30, 2026, to Native American representatives and interested parties identified by the NAHC. To date, one response has been received. On March 31, 2026, the Viejas Band of Kumeyaay Indians noted that the project area may “contain many sacred sites to the Kumeyaay people” and requested that the sites be avoided with adequate buffer zones. Additionally, the Viejas Band of Kumeyaay requested that all pertinent state and federal laws and regulations be followed, and to be informed of any project changes or inadvertent discoveries. AB 52 consultation letters were prepared and sent to 17 Native American representatives on April 13, 2026. In addition, a follow-up email was sent on June 29, 2026, to each of the 17 Native American representatives, which extended the original 30-day consultation period from April 13, 2026, to July 17, 2026.

After this extended consultation request period concluded, the San Pasqual Band of Mission Indians Tribal Historic Preservation Office submitted a written response to the District on October 6, 2026 requesting government-to-government consultation pursuant to AB 52. In its response, the San Pasqual Band of Mission Indians representative expressed its request to consult on the proposed project and requested access to cultural resources reports that have been prepared for the project. Although this letter was received outside of the AB 52 consultation period, the tribe was provided with the project Cultural Resources Technical Report on October 20, 2026.

A pedestrian survey of the project site was conducted by an archaeologist and a Kumeyaay Native American monitor. Visibility during the survey was excellent, with much of the area cleared of vegetation and heavily disturbed by grading and vehicle activity. No tribal cultural resources were identified during the pedestrian survey. As described in Section 3.4.1.5 of this EIR, the records search and pedestrian survey indicated that the project vicinity is culturally sensitive, but no known cultural resources, including tribal cultural resources, exist on the project site. The entire project site is

considered to have low archaeological sensitivity based on the results of the study, environmental factors (the heavily disturbed nature of the site), and the amount of modern development that has previously occurred for the entire airport.

3.14.2 Regulatory Framework

A summary of federal and state regulations that pertain to tribal cultural resources is provided below. No regional, District, or local regulations regarding tribal cultural resources apply to the project.

3.14.2.1 Federal

See Section 3.4, *Cultural Resources*, for a discussion of federal cultural resources regulations. Cultural resources listed in the National Register of Historic Places may also be considered tribal cultural resources.

3.14.2.2 State

See Section 3.4, *Cultural Resources*, for a discussion of additional state cultural resources regulations. Cultural resources listed in the CRHR may also be considered tribal cultural resources.

Assembly Bill 52

On September 25, 2014, Governor Brown signed AB 52 to require consultation with Native American tribes. AB 52, effective July 1, 2015, introduced tribal cultural resources as a class of cultural resources and additional considerations relating to Native American consultation into CEQA. As such, a project that would have an adverse effect on a significant tribal cultural resource would have a significant impact under CEQA.

AB 52 also established a government-to-government consultation process for consultation between lead agencies and Native American tribes for projects subject to CEQA that are not subject to consultation under Senate Bill 18. Within 14 days of finalizing a decision to undertake a project, the lead agency must provide formal notification to the appropriate tribes, which then have 30 days to respond to request consultation. By requiring consideration of tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and tribal governments, public agencies, and project proponents would have information available early in the project planning process to identify and address potential adverse impacts to tribal cultural resources.

Native American Heritage Values

California AB 52, discussed above, revised PRC Section 21074 to include tribal cultural resources as an area of environmental impact analysis under CEQA. As a general concept, a tribal cultural resource is similar to the federally defined term Traditional Cultural Properties; however, it incorporates consideration of local and state significance and requires mitigation under CEQA. “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

Per PRC Section 21080.3, a CEQA lead agency must consult with any California Native American tribe that requests consultation and that is traditionally and culturally affiliated with the geographic area of a proposed project to identify resources of cultural or spiritual value to the tribe, even if such resources are already eligible as historical resources as a result of cultural resources studies. A tribal cultural resource may be considered significant if it is (i) included in a local or state register of historical resources; (ii) determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1; (iii) a geographically defined cultural landscape that meets one or more of these criteria; (iv) a historical resource described in PRC Section 21084.1 or a unique archaeological resource described in PRC Section 21083.2; or (v) a non-unique archaeological resource if it conforms with the above criteria.

3.14.3 Thresholds of Significance

Thresholds used to evaluate potential tribal cultural resource impacts are based on CEQA Guidelines Appendix G. A significant tribal cultural resource impact could occur if implementation of the proposed project would:

1. The project, as designed, causes a substantial adverse change in the significance of a tribal cultural resource as defined in PRC, Section 21074, as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

    a. listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC 5020.1(k); or

    b. resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria in PRC 5024.1(c). In applying these criteria, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

3.14.4 Impact Analysis

3.14.4.1 Tribal Cultural Resources

Threshold 1: Would the project, as designed, causes a substantial adverse change in the significance of a tribal cultural resource as defined in PRC, Section 21074, as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is (a) listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC 5020.1(k); or (b) resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria in PRC 5024.1(c). In applying these criteria, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

Impact Discussion

No known tribal cultural resources exist on the project site. As described in 3.14.1, the Viejas Band of Kumeyaay Indians noted that the project area may "contain many sacred sites to the Kumeyaay people". In addition, the Sacred Lands File search by the NAHC was positive and indicated which tribal groups

consider the area sensitive for resources. However, the project site itself has been determined to have a low sensitivity level for cultural resources, based on the results of the pedestrian survey for resources, the heavily disturbed nature of the site, and the amount of modern development that has previously occurred for the entire airport (HELIX 2026). The District initiated AB 52 consultation on April 13, 2026, and no consultation was requested from tribal groups within the 30-day consultation request period. However, as described in Section 3.14.1.4, representatives of the San Pasqual Band of Mission Indians Tribal Historic Preservation Office requested to undertake consultation and be provided additional information about the project on October 6, 2026. Although the request was received outside of the AB 52 consultation period, the tribe was provided with the project Cultural Resources Technical Report on October 20, 2026. As the project site has been determined to have low sensitivity for tribal cultural resources, and based on the lack of requested consultation, tribal cultural resources are not expected to be encountered and impacts would be **less than significant**.

3.14.5 Cumulative Impact Analysis

The geographic scope of the cultural resources cumulative analysis is the southern California region, including both incorporated and unincorporated areas of San Diego County, surrounding counties, and Baja California due to the overlapping tribal cultural histories in these areas.

3.14.5.1 Tribal Cultural Resources

Known and unknown tribal cultural resources occur in the southern California region, and past cumulatively considerable impacts have occurred through the destruction of tribal cultural resources during development. Cumulative projects would be required to comply with state laws and requirements (AB 52, Senate Bill [SB] 18, etc.) and mitigate any potential impacts to tribal cultural resources through monitoring or recovery programs. However, due to the widespread presence of tribal cultural resources (including tribal cultural resources and resources of tribal significance) in the region, it cannot be guaranteed that all projects would avoid significant impacts to tribal cultural resources; therefore, a significant cumulative impact associated with tribal cultural resources would occur.

As discussed in Sections 3.14.1 and 3.14.4 above, no known tribal cultural resources were identified on the project site and site sensitivity is considered low. Additionally, no requests for tribal consultation were received during the AB 52 consultation process. As a result, it is not expected that tribal cultural resources or cultural resources of tribal significance would be impacted during project ground disturbing activities. Project-specific impacts were identified as less than significant. As a result, the project **would not considerably contribute to a significant cumulative impact** to tribal cultural resources.

3.15 Utilities and Service Systems

This section addresses the potential utilities and service systems impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to utilities and service systems are also addressed.

3.15.1 Environmental Setting

3.15.1.1 Water Supply

City of San Diego

The City of San Diego's (City's) Public Utilities Department (PUD) provides water services to approximately 1.4 million customers through a water system that serves over 404 square miles comprised of land within the City, including the project site, as well as several communities outside the City (City 2026a). The City's PUD imports 85 to 90 percent of its water from other areas such as northern California and the Colorado River. To do this, the PUD purchases imported water from the San Diego County Water Authority (SDCWA). The SDCWA was formed for the purpose of purchasing Colorado River water from The Metropolitan Water District of Southern California (MWD) for conveyance to San Diego County.

The Metropolitan Water District of Southern California

MWD was formed in 1928 to develop, store, and distribute supplemental water in Southern California for domestic and municipal purposes. MWD is a wholesale supplier of water to its member agencies, which includes the SDCWA. It obtains supplies from local sources as well as the Colorado River via the Colorado River Aqueducts, which it owns and operates. It also obtains water supplies via the Sacramento-San Joaquin Delta via the State Water Project. Planning documents such as the Regional Urban Water Management Plan and Integrated Water Resources Plan help to ensure the reliability of water supplies and the infrastructure necessary to provide water to Southern California.

MWD's second major water source is the State Water Project, owned by the State of California and operated by the Department of Water Resources. The State Water Project's supply originates in Northern California with water captured from the Feather River Watershed behind Lake Oroville Dam. MWD's contract with the Department of Water Resources provides for the ultimate delivery of 1,912,000 AFY, which is 46 percent of the total State Water Project entitlement (SDCWA 2026).

MWD's existing water supplies have been historically sufficient to meet demands within its service area during years of normal precipitation, and while it manages reserve supplies to account for normal drought conditions, regulatory actions have placed limitations on its ability to provide water to its member agencies. In 2022, MWD requested and received delivery of human health and safety water supplies from the Department of Water Resources to partially meet the demands of member agencies in the northern portion of its service area. MWD's 2025 Urban Water Management Plan (UWMP) concludes that MWD has sufficient supply capabilities to meet expected demands under the single driest year and the multiple-dry year scenarios through 2050 (SDCWA 2026).

San Diego County Water Authority

SDCWA is an independent public agency that serves as the County's regional water wholesaler. As a retail member agency of SDCWA, the PUD purchases water from the SDCWA for retail distribution within its service area.

SDCWA's 2025 UWMP includes a summary of the total projected water supplies and demands within SDCWA's service area over 20 years (2030-2050) in five-year increments under normal, single dry, and multiple dry water years. SDCWA's reliability assessment demonstrates that with conservative assumptions regarding the availability of dry year supplies from MWD, the San Diego region's existing and projected water resource mix is increasingly drought-resilient and there would be no shortages anticipated in normal year, drought year, or multiple dry year projections in the service area (SDCWA 2026).

3.15.1.2 Water, Sewer, and Storm Water Infrastructure

Water Treatment and Distribution System

The City's water system consists of a large network of infrastructure connecting residents and businesses to the water supply. The City's water system includes nine surface raw water storage reservoirs, three water treatment plants, 29 potable water storage facilities, approximately 3,300 miles of water transmission and distribution pipelines, and 49 water pump stations (City 2026b). The City runs three water treatment operations—Otay Water Treatment Plant, Alvarado Water Treatment Plant, and Miramar Water Treatment Plant—with a total of 298 million gallons per day capacity (City 2026c).

The City also operates two recycled water facilities. The North City and South Bay Water Reclamation Plants were built to treat wastewater to a level that would be approved for non-potable uses such as landscape irrigation and manufacturing. These facilities provide water to City residents and businesses, as well as other jurisdictions and water districts.

In addition, the City is completing Phase 1 of the Pure Water San Diego Program, which is scheduled to start up in late 2026. Pure Water San Diego is a phased, multi-year program where Phase 1 is planned to produce 30 million gallons per day (mgd) of potable water. Production is expected to be a staged ramp-up in flow, with 30 mgd produced by late 2027. The Pure Water San Diego Program will use proven water purification technology to clean recycled water to produce safe, high-quality water for potable reuse. Phase 1 will provide purified water to the Miramar Reservoir (City 2026a).

The City's PUD supplies potable water to the project vicinity via the Shepherd Canyon Pipeline, which is fed by the SDCWA's Second Aqueduct. Water from the Second Aqueduct is treated at both the City's Miramar Water Treatment Plant (WTP) and the City's Alvarado WTP.

Wastewater Collection System

The City's PUD provides wastewater collection, treatment, reclamation and disposal services to the San Diego region through its Municipal (Muni) System and Metropolitan (Metro) System. The Muni System consists of approximately 3,000 miles of pipelines, 77 sewer pump stations, and 64 permanent flow monitoring stations. The Muni System is primary used to collect and convey wastewater from residences and businesses in the City. The Metro System consists of three WTPs, one biosolids processing facility, four large pump stations, two interceptors, 98 permanent flow monitoring stations, and two outfalls.

The Metro System provides treatment and disposal services for the City and 12 other agencies and districts within a 450-square mile area (City 2026b). In general, all wastewater generated in the project vicinity is conveyed southwesterly towards the North Metro Interceptor, where it continues through to the Point Loma WTP.

The Metropolitan Sewerage System treats the wastewater from the City and 15 other cities and districts from a 450-square mile area with a population of over 2.2 million. The system treats an average of 180 million gallons of wastewater each day. Sewage collected is conveyed and processed through a sewer infrastructure system and ultimately discharges at the Point Loma WTP.

The Point Loma WTP treats approximately 175 million gallons per day of wastewater per day generated in its 450-square-mile service area. The Point Loma WTP has a treatment capacity of 240 mgd (City 2026d).

Storm Water Conveyance System

Storm water runoff originating at the project site is conveyed to receiving waters via paved areas, gutters, and storm drains. In general, storm water runoff from the project site and surrounding areas within the approximately 3,150-acre Murphy Canyon Basin drains to Murphy Canyon Creek, which eventually drains into the San Diego River. Storm water flows from the San Diego River is ultimately discharged into the Pacific Ocean.

3.15.1.3 Energy

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the project vicinity. SDG&E is regulated by the California Public Utilities Commission (CPUC) who sets the gas and electricity rates for SDG&E and is responsible for making sure that California utilities customers have safe and reliable utility service at reasonable rates, protecting utilities customers from fraud and promoting the health of California's economy.

SDG&E supplies customers with electricity generated both locally and outside of the utility's service territory, with local facilities currently capable of generating a total of approximately 3,100 megawatts of power. SDG&E owns and contracts with generation facilities both within and outside its service territory, and power is also produced in local facilities that are non-utility owned. Local generation is important for local power supply needs due to the voltage support it provides that keeps the electric system running smoothly.

Natural gas is imported into the San Diego region by pipeline after being produced at any of several major supply basins located from Texas to Alberta, Canada. Although the San Diego region has access to all of these basins by interstate pipeline, the final delivery into the SDG&E system is dependent on just one Southern California Gas Company pipeline that enters San Diego County from Orange County located along I-5.

3.15.1.4 Communications

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Spectrum, and other independent cable companies. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote

economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed development projects.

3.15.1.5 Solid Waste Management

Solid waste generated in the project vicinity is collected by private franchised haulers and taken to one of three active landfills permitted to accept solid waste: West Miramar Sanitary Landfill (Miramar Landfill), Otay Landfill, and Sycamore Sanitary Landfill (Sycamore Landfill). Miramar Landfill and Sycamore Landfill are located within the City. Otay Landfill is located within an unincorporated area within the City of Chula Vista. The Greenery at the Miramar Landfill provides the majority of organic waste processing capacity. According to the Solid Waste Information System (SWIS) database maintained by the California Department of Resources Recycling and Recovery (CalRecycle), the Miramar Landfill had a remaining capacity of approximately 11,080,871 cubic yards of solid waste as of January 30, 2020. Based on the remaining capacity and disposal rates, Miramar Landfill is expected to close January 1, 2031 (CalRecycle 2026). The SWIS database indicates that the Sycamore Landfill had a remaining capacity of 113,972,637 cubic yards as of December 31, 2016, and is expected to close December 31, 2042. The Otay Landfill had a remaining capacity of 21,194,008 cubic yards as of May 31, 2016, and is expected to close February 28, 2030 (CalRecycle 2026).

3.15.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to utilities and service systems is provided below.

3.15.2.1 Federal

Clean Water Act

The Clean Water Act was created with the goal of restoring and preserving the chemical, physical, and biological integrity of the nation's waterways. The main way this is achieved is by preventing pollution from entering waterways and assisting publicly owned wastewater treatment facilities in improving wastewater treatment capabilities. To this end, the Clean Water Act regulates the water quality of all discharge into the waters of the United States including wetlands and perennial and intermittent stream channels.

Safe Drinking Water Act

The Safe Drinking Water Act authorizes the U.S. Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against both naturally occurring and human-made contaminants that may be found in drinking water. Potential contaminants include improperly disposed chemicals, animal wastes, pesticides, human threats, waste injected underground, and naturally occurring substances. In addition, water that is not properly treated may pose a threat to drinking water. The Safe Drinking Water Act applies to all public water systems across the nation. The USEPA, individual states, and water systems work in coordination to ensure that these standards are met. The USEPA identifies potential contaminants, determines an allowable maximum contaminant level, and enforces the set standards.

3.15.2.2 State

Urban Water Management Planning Act

In 1983, state legislature enacted the Urban Water Management Planning Act (California Water Code sections 10610 through 10656), which requires every urban water supplier that provides water to 3,000 or more customers, or more than 3,000 acre-feet of water annually, to complete an UWMP every 5 years ending in "5" and "0". Each UWMP must include a description of the service area, existing and planned sources of water available to the supplier, how much water the agency has on a reliable basis, how much it needs for the foreseeable future, the agency's strategy for meeting its water needs, the challenges facing the agency, and any other information necessary to provide a general understanding of the agency's plan. A UWMP is required for a water supplier to be eligible for the State Department of Water Resources' grants, loans, and drought assistance.

Senate Bills 221 and 610

Senate Bill (SB) 221 and SB 610 went into effect in January 2002 with the intention of linking water supply availability to land use planning by cities and counties. SB 610 requires water suppliers to prepare a Water Supply Assessment report for inclusion by land use agencies during the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of a large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential developments of more than 500 units; shopping centers or businesses employing more than 1,000 people; shopping centers or businesses having more than 500,000 SF of floor space; commercial office buildings employing more than 1,000 people; and/or commercial buildings having more than 250,000 SF of floor space or occupying more than 40 acres of land.

Senate Bill 606

SB 606 requires urban retail water suppliers to calculate an urban water use objective. The urban water use objective is an estimate of aggregate efficient water use from the previous year based on adopted water use efficiency service area characteristics for that year. New requirements for the urban water use objectives became effective after June 2022 when SWRCB adopted urban water use efficiency standards, performance measures, and variances. Urban water suppliers shall achieve the urban water use objective by Jan 1, 2027. An urban supplier that does not meet its objective may be required by the SWRCB to enact policies and projects that result in additional water savings.

Water Recycling Act

The Water Recycling Act of 2013 (AB 803) eliminates inconsistent recycled water spill reporting thresholds by making those in the California Health and Safety Code consistent with those in the Porter-Cologne Water Quality Control Act. In addition, AB 803 authorizes RWQCBs to permit the introduction of Advanced Treated Purified Water into conveyance systems prior to comingling with any raw water or other water source. The bill defines Advanced Treated Purified Water as wastewater treated by a method at least as effective as membrane filtration, reverse osmosis, advanced oxidation, disinfection, and engineered reliability features.

Water Conservation Act

The Water Conservation Act of 2009 (SB X7-7) required all water suppliers to increase water use efficiency. The legislation set an overall goal of reducing per capita water use by 20 percent compared to water provider-specific baseline levels by 2020, with an interim goal of 10 percent reduction by 2015. Effective in 2016, urban retail water suppliers that did not meet the water conservation requirements established by this bill were not eligible for state water grants or loans. SB X7-7 requires urban retail water suppliers to determine baseline water use and set reduction targets according to specified standards.

CALGreen

Refer to Section 3.5.2.2 for further discussion of the California Green Building Standards Code (CALGreen); California Code of Regulations [CCR] Title 24, Part 11), especially as it relates to energy efficiency and GHG emission reductions. Portions of CALGreen relevant to water use and solid waste are described here. CALGreen provides mandatory water efficiency and conservation measures for both residential and non-residential development. The mandatory measures specify allowable flow rates for different appliances and require compliance with the MWELO (or applicable, more stringent local ordinance). CALGreen also requires at least 65 percent of non-hazardous construction and demolition debris is recycled and/or salvaged for reuse during construction.

California Integrated Waste Management Board Solid Waste Policies

Assembly Bill (AB) 939, the Integrated Waste Management Act, established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (now CalRecycle) and local agencies in the implementation of programs geared at (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 also included waste diversion mandates that require all cities and counties to divert 50 percent of all solid waste through source reduction, recycling, and composting activities. The Integrated Waste Management Act also requires that each county provide capacity for solid waste generated within its jurisdiction that cannot be reduced or recycled for a 15-year period.

Assembly Bill 341

In 2011, the state enacted AB 341, which established a policy goal for California of 75 percent recycling, composting, or source reduction of solid waste by 2020. AB 341 requires that commercial enterprises that generate four cubic yards or more of solid waste weekly and multi-family complexes comprised of five units or more arrange for recycling services. Businesses must provide organics and recycling containers at front-of-house to collect waste generated from products purchased and consumed on the premises.

3.15.2.3 District

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines Standard Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and SDCCD Sustainability Levels.

Sustainability Plan

The District's Sustainability Plan incorporates the California Community Colleges Chancellor's Office's comprehensive Climate Action and Sustainability Framework, which includes the following goals related to utilities and service systems.

Water Conservation

- 2025 Benchmark: Benchmark potable water usage.
- 2030 Goal: Reduce potable water usage by 25%.
- 2035 Goal: Reduce potable water usage by 50%.

Waste Reduction

- 2025 Benchmark: Benchmark and comply with state regulations.
- 2030 Goal: Reduce total material consumption by 10%.
- 2035 Goal: Decrease consumption of materials by 25%.

These goals incorporated into the District's Green Growth program that shall be considered on future facility improvement projects include the following goals and associated Key Performance Indicators (KPIs) related to utilities and service systems.

Materials Impact Goal 1: Reduce waste going to landfill by 75 percent compared to current levels by 2030. **KPI:** Require contractors to submit waste tickets and documentation to verify diversion.

Water Impact Goal 1: Decrease water usage. **KPI:** Separate landscape from domestic water reporting. **KPI:** Implement rainwater capture. **KPI:** Use water efficient plumbing fixtures. **KPI:** Plant native and water efficient planting.

Water Impact Goal 3: Upgrade & Improve long term maintenance of utilities. **KPI:** Increase number of valves on utility loops to allow for increased maintenance access. **KPI:** Provide monitoring system of underground utilities. **KPI:** Eliminate waterless fixtures.

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following specifications are related to utilities and service systems.

Construction Waste Management and Disposal

General requirements outlined in this section include the implementation of a construction waste management plan to reduce the amount of waste going to landfills during construction. Contractors are required to provide a Waste Management Plan to Campus Facility Services that specifies the locations on campus where recycled materials will be collected, staged, handled, and picked up. Source separation of construction waste for recycling is required wherever possible. This section additionally outlines the waste reduction goals of the District, which include a minimum "end-of-project" recycling rate of 75 percent for non-hazardous solid waste, a further goal of 90 percent diversion from landfills

and incinerators by weight, including both demolition and construction waste, and efficient material use and diversion of waste from landfills.

This section defines materials that would be recycled and salvaged during construction of District projects. These include demolition waste (asphalt paving and concrete); construction waste (masonry and concrete masonry unit, wood and sheet materials, metals, roofing materials, insulation, carpet and pad, gypsum board, piping, and electrical conduit). In addition, this section states that uncontaminated packaging materials (paper, cardboard and boxes, plastic sheet and film, polystyrene packaging, wood crates, and plastic pails) must be salvaged or recycled at a rate of 100 percent.

Sanitary and Storm Sewer Systems

This section defines goals and objectives related to sanitary and storm sewer systems on District properties, and states that the design of stormwater and sanitary sewer systems should involve coordination with state and local governing authorities and should comply with the Phase II MS4 permit requirements regarding stormwater discharge from the campus. In addition, stormwater shall be filtered through landscaping or other means whenever possible.

3.15.2.4 Local

City Council Policies

Council Policy 400-04 outlines the City's Emergency Water Storage Program. The policy mandates that the City's PUD store sufficient water in active, available storage to meet 7.2 months (three-fifths of the annual) of normal City water demand requirements, excluding conservation. Active, available storage is defined as the portion of water that is above the lowest usable outlet of each reservoir.

Council Policy 400-13 identifies the need to provide maintenance access to all sewers to reduce the potential for spills. The policy requires that environmental impacts from access paths in environmentally sensitive areas should be minimized to the maximum extent possible using sensitive access path design, canyon-proficient maintenance vehicles, and preparation of plans that dictate routine maintenance and emergency access procedures.

Per City Council Policy 800-04, private landowners/developers are responsible for providing adequate storm water drainage facilities, which are subject to review and approval by the City. Council Policy 800-04 states it is the basic responsibility of any owner or holder of land to accept and provide a suitable conveyance of storm water runoff, and that the cost of construction will be borne by the property owner or permittee. All continuing maintenance of such facilities becomes the responsibility of the property owner on whose land the facilities are located. The City's Transportation and Storm Water Department is only responsible for maintaining and upgrading public storm water drainage facilities that occur on City-owned land, and areas where easements have been granted to and accepted by the City.

City of San Diego Sewer Design Guidelines

The City's Sewer Design Guidelines set forth criteria to be used for the design of sewer systems, which may consist of pump stations, gravity sewers, force mains, and related appurtenances. It includes criteria for determining capacity and sizing of pump stations, gravity sewers and force mains, alignment of gravity sewers and force mains, estimating wastewater flow rates, design of bridge crossings, and corrosion control requirements.

City of San Diego Water Facility Design Guidelines

The City's Water Facility Design Guidelines identify general planning, predesign, and design details and approaches to be used for water infrastructure. The guidelines provide uniformity in key concepts, equipment types, and construction materials on facilities built under the Water Capital Improvement Plan. These design guidelines assist in providing professionally sound, efficient, uniform, and workable facilities, whether pipelines, pressure control facilities, pumping stations, or storage facilities.

City of San Diego 2025 Urban Water Management Plan

The City's 2025 UWMP was developed to serve as the City's overarching water resources planning document to address the City's water system, water demand, water supply resources, conservation efforts, and historic and projected water use. The purpose of the UWMP is to maintain the efficient use of urban water supplies, confirm that sufficient water supplies are available for future beneficial use, and provide a mechanism for response during water drought conditions (City 2026a). The 2025 UWMP was adopted in May 2026 and was prepared in response to California Water Code Sections 10610 through 10656 of the Urban Water Management Planning Act. Included in the 2025 plan is detailed information about the City's water demand, supply and reliability projections through the 2050 planning horizon.

City of San Diego Public Utilities Department Water Conservation Program

Established in 1985, the PUD's Water Conservation Program was established to reduce San Diego's dependence on imported water. Savings are achieved through the implementation of programs, policies, and ordinances promoting water conservation practices. All residential, commercial, and industrial buildings are required to be certified as having water-conserving plumbing fixtures in accordance with San Diego Municipal Code Chapter 14, Article 7, Division 4. The PUD works in collaboration with the MWD and SDCWA to formulate new conservation initiatives and annually checks progress toward conservation goals.

City of San Diego Long-Range Water Resources Plan

The PUD also adopted the Long-Range Water Resources Plan in 2013, which provides guidance and input on alternative strategies for meeting San Diego's water needs by addressing concerns such as population growth and water resource diversification. The Plan details existing water supplies, new water supply opportunities, objectives, performance measures, and conclusions and recommendations.

City of San Diego Climate Action Plan

The City's 2022 Climate Action Plan (CAP) aims to reduce landfill waste by promoting a Zero Waste by 2040 goal. The City implements the City Recycling Ordinance and Construction and Demolition Debris Deposit Ordinance and a variety of other waste diversion programs to position the City to achieve zero waste. In addition, the City has expanded its efforts to increase composting and prevent food waste in response to California State SB 1383, which requires the reduction of organic waste disposed of in landfills.

City of San Diego Zero Waste Plan

The City's Zero Waste Plan, a component of the City's CAP, was approved and adopted by the City Council on July 13, 2015. The CAP was updated in August 2022 and includes Strategy 4: Circular Economy and Clean Communities Measure 4.4, which calls for the City to update its zero waste plan. In the updated CAP, the City established waste diversion targets of 82 percent in 2030 and 90 percent in 2035. The 2015 Zero Waste Plan identified that the City increased its diversion rate from approximately 40 percent in 1995 to approximately 67 percent in 2013. In addition, the Zero Waste Plan discusses how the adoption and implementation of the City Recycling Ordinance (San Diego Municipal Code Chapter 6, Article 6, Division 7), Construction and Demolition Debris Deposit Ordinance (San Diego Municipal Code Chapter 6, Article 6, Division 6), and "a variety of other waste diversion programs" have moved the City closer to the goals outlined in the Zero Waste Plan.

City of San Diego Drainage Design Manual

The City's Drainage Design Manual (City 2017) provides policies and procedures to attain reasonable standardization of drainage design throughout the City. The Drainage Design Manual establishes design standards and design procedures for stormwater conveyance and hydrology analysis for flood management and water quality facilities in the City. These design standards and procedures provide guidance to design engineers, developers, contractors, and others in the selection, design, construction, and maintenance of stormwater conveyance facilities.

City of San Diego Stormwater Standards

The City's Stormwater Standards were developed to comply with National Pollutant Discharge Elimination System permits administered by the state. To comply with permit requirements, the City is required to develop and implement stormwater pollution controls for private and public development projects for both the construction and postconstruction phases. Stormwater pollution controls, in the form of both structural and nonstructural best management practices are designed to reduce pollutants discharged from project sites to the maximum extent practicable. Refer to Section 3.9.2.5 for additional details.

Waste Management Plans

Pursuant to the City's 2022 CEQA Significance Determination Thresholds, land development projects more than 40,000 SF that may generate approximately 60 tons of waste or more during construction and/or operation are required to prepare a project-specific Waste Management Plan to address disposal of waste generated during short-term project construction and long-term post-construction operation. The Waste Management Plan is required to identify how the project would reduce waste and achieve target reduction goals.

3.15.3 Thresholds of Significance

Thresholds used to evaluate potential utilities and service systems impacts are based on CEQA Guidelines Appendix G. A significant utilities and service system impact could occur if implementation of the proposed project would:

1. 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 of relocation of which could cause significant environmental effects;

2. Have sufficient water supplies available to serve the project and reasonable foreseeable future development during normal, dry, and multiple dry years;

3. Result in a determination by the waste water treatment provide, 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;

4. 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; or

5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.15.4 Impact Analysis

3.15.4.1 New or Expanded Utilities

Threshold 1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of relocation of which could cause significant environmental effects?

Impact Discussion

The project would result in an increase in building area at the project site, with the new building totaling 18,000 SF, in place of the existing 6,300-SF Miramar Hangar. The proposed increase in building square footage would allow for an increase from the existing 15 class sessions per week to 28 class sessions per week. Additional students and staff present at the project site would generate additional wastewater, though this increase is expected to be minimal. To serve the expanded instructional facilities, the project would include the construction of connections to existing City-owned utility lines located in Kearny Villa Road to the west of the project site, including water, fire water, and sewer. In addition, the project would involve coordination with SDG&E for new underground electric power, fiber optic, and natural gas connections. Each of these topics are discussed in more detail below.

Water

New on-site water and fire water points of connection would be installed approximately five feet west of the project building. These new connections would connect to newly installed domestic and fire water service lines constructed as part of the project, which would then connect to the existing City-

owned utility lines in Kearny Villa Road. The project would result in an increase in weekly classroom sessions and a corresponding increase in the number of students and staff present; however, newly installed water infrastructure on site would be sized to meet the project's needs with adequate remaining capacity available. As discussed in Section 3.15.4.2, the new building would be designed to achieve the level of Certified/ Coast Live Oak (Sustainable Performance), including the use of high-efficiency low-flow plumbing fixtures, water-conserving appliances, and efficient irrigation systems. Further, the project would not involve installation of landscaping on the site that would require additional water supplies. While the proposed project would result in increased water usage at the project site, the amount of water anticipated to be required for such operations would not substantially increase water demand beyond what is currently used or require the construction of new or expanded water facilities off-site.

Wastewater Treatment

The project would include the installation of new sewer lateral and sewer drains along the northern portion of the project building. The new lateral would be constructed in the northwest portion of the project site, to the west of the proposed building. This lateral would connect to the existing City-owned utility lines in Kearny Villa Road. While the project would result in increased wastewater generation at the project site, the amount of wastewater generated would not substantially increase wastewater in such a manner as to require the construction of new or expanded wastewater facilities.

Storm Water Drainage

Storm water from the project site turns to runoff, which is then conveyed off site via paved surfaces, gutters, and storm drains. The project would install stormwater infrastructure on the project site, consisting of a new storm drain pipe along the perimeter of the new building, which would connect to a modular wetland system and underground vault located near the southwestern corner of the hangar. In addition, a storm drain would be constructed within the central portion of the parking lot which would connect to a modular wetland system and underground vault located in the western portion of the parking lot. These systems would direct flows to the existing gutter in Kearny Villa Road. Stormwater infrastructure has been designed to handle the expected capacity requirements of the project and the overall quantity of stormwater runoff from the project site is not anticipated to increase substantially such that off-site infrastructure capacity would be exceeded. Additionally, the proposed underground modular wetland system is a manufactured stormwater treatment system and is not intended to create an open constructed wetland, open pond, or above-ground detention feature. The design would also be coordinated with Federal Aviation Administration (FAA) Advisory Circular 150/5200-33, Hazardous Wildlife Attractants on or Near Airports, and with the City of San Diego Airport Division so that stormwater facilities do not create bird, wildlife, or vector attractants within the airport environment. The stormwater management facilities to be installed at the project site would be designed to drain within 48 hours after a storm event, to comply with FAA requirements for minimizing the attraction of hazardous wildlife on or near public airports.

Electricity

As discussed in Section 3.5.4.1, the project would increase the overall demand for electricity on the project site. Per the District Architect, the project would consume between 200,000 and 400,000 kilowatt-hours of electricity per year. The project would require a new SDG&E transformer on the west side of the structure and new electrical lines; however, the installation of these facilities would be constructed as part of overall site development. While the project would result in a larger structure and

an increase in the number of weekly class sessions, the project would also replace the older and less efficient Miramar Hangar with an instructional space constructed in compliance with current, more stringent energy codes, making electricity use more efficient. Further, the District has developed the Sustainability Levels, which provide a tiered rating system that encourages environmentally responsible design, construction, and operations. The project would achieve the Certified/Coastal Live Oak level, which is defined as a building that implements significant sustainable strategies (see Section 3.5.2.3 for additional information regarding this program). With adherence to state building codes that regulate energy efficiency and implementation of the District policies related to energy conservation outlined above, the project would not result in electricity demand beyond what is currently used in such a manner as to require the construction of new or expanded electrical facilities off-site.

Natural Gas

The project is not anticipated to utilize natural gas and would instead be all electric. Therefore, implementation of the project would not result in the need for the construction of new or expanded natural gas facilities.

Telecommunications Facilities

Private utility companies currently provide communications systems within the project vicinity. Connections would be made to existing underground infrastructure. As such, the project would not require or result in the relocation of construction of new or expanded telecommunications facilities.

In conclusion, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of relocation of which could cause significant environmental effects**. Impacts would be less than significant**. No mitigation is required.

3.15.4.2 Water Supplies

Threshold 2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during the normal, dry and multiple dry years?

Impact Discussion

The MWD and the SDCWA have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. MWD's Regional Urban Water Management Plan and Integrated Water Resources Plan, and the SDCWA's UWMP and annual water supply report include water infrastructure projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water.

The District Architect estimated the project would consume 273,750 gallons of indoor water per year and 24,000 gallons of outdoor water per year (District 2026). However, the actual amount of outdoor water that would be consumed by the project would be less as this estimation assumed that the project would include the installation of landscaping which has been subsequently removed from the project. The City's 2025 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur by 2050 (City 2026a). Based on a normal water supply year, the estimated water supply projected in five-year increments for a 25-year projection will meet the City's projected water demand of 173,510 AF in 2030;

174,322 AF in 2035; 175,829 AF in 2040; and 177,696 AF in 2045; and 178,259 AF in 2050 (City 2026a). Based on a single-dry year forecast, the estimated water supply will meet the projected water demand of 180,450 AF in 2030; 181,295 AF in 2035; 182,862 AF in 2040; 184,804 in 2045; and 185,390 AF in 2050 (City 2026a). Based on a multiple-dry year, third year supply, the estimated water supply will meet the projected demands of 180,450 AF in 2030; 181,295 AF in 2035; 182,862 AF in 2040; 184,804 AF in 2045; and 185,390 AF in 2050 (City 2026a).

Consistent with the District Sustainability Levels framework, the proposed project would be designed to achieve the level of Certified/ Coast Live Oak (Sustainable Performance), including the use of high-efficiency low-flow plumbing fixtures, water-conserving appliances, and efficient irrigation systems. As discussed above, the project would not involve installation of landscaping on the site that would require additional water supplies. While the proposed project would result in increased water usage at the project site, the amount of water anticipated to be required for such operations would not substantially increase water demand beyond what is currently used or beyond projected available supplies. As such, there is sufficient water planned to supply the annual usage for the proposed project, and the water demand resulting from the proposed project would result in no unforeseen or excessive demands.

In summary, the proposed project would be consistent with the water demand assumptions outlined in the City's UWMP. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve projected water demands. Implementation of the project would not result in insufficient water supplies during normal, dry, and multiple dry years. **Impacts would be less than significant**. No mitigation is required.

3.15.4.3 Wastewater

Threshold 3: Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Discussion

The proposed project would involve an increase in building area from 6,300 SF to 18,000 SF, allowing 13 additional classroom sessions weekly. Based on estimates provided by the District Architect, the project is anticipated to generate approximately 273,750 gallons of indoor water per year (translating in part to wastewater; District 2026). As the proposed project would represent a minor increase in wastewater generation at the project site, and the Point Loma WTP has a remaining capacity of 65 mgd, based on the existing flows of 175 mgd and treatment capacity of 240 mgd, the Point Loma WTP would have adequate capacity to serve the project. **Impacts would be less than significant**. No mitigation is required.

3.15.4.4 Solid Waste Generation

Threshold 4: Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact Discussion

The increase in solid waste generated by the project through the addition of class sessions, students, and staff beyond what is currently occurring would be minimal compared to the remaining capacity of the area landfills. Based on data provided by the District Architect, the project is estimated to generate 18 tons of solid waste per year (District 2026). Using the Volume-To-Weight Conversion chart for Campus Waste (loose) published by the USEPA, this would equate to approximately 400 cubic yards of solid waste per year (USEPA 2026). As discussed in Section 3.15.1.5, with the dates of remaining capacity identified for each landfill in Section 3.15.1.5, the Miramar Landfill had a remaining capacity of approximately 11 million cubic yards, the Sycamore Landfill had a remaining capacity of approximately 144 million cubic yards, and the Otay Landfill had a remaining capacity of approximately 21 million cubic yards. Further, the project would comply with all applicable state and District solid waste regulations to reduce waste in landfills as further discussed in Section 3.15.4.5 below. Implementation of the project would not generate solid waste in excess of state or local standards, in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **Impacts would be less than significant**. No mitigation is required.

3.15.4.5 Solid Waste Regulations

Threshold 5: Would the project comply with federal, state, and local management and reduction statues and regulations related to solid waste?

Impact Discussion

During demolition, clearing and grubbing, grading, and construction activities, the proposed project would generate waste in the form of excavated soils, green waste, asphalt, concrete, existing building debris, and other construction and demolition waste. The types of demolition debris that would likely be generated during construction would include metals, concrete and asphalt, and fixtures. In addition, the operation of the project would contribute additional non-recyclable and/or non-reusable waste that would be deposited at Miramar Landfill.

Although the District is not obligated (but is encouraged) to adopt waste diversion goals that are in line with the state's goals established in AB 939 and AB 341, the District Design Guidelines and Standards Manual identifies the goal of achieving a minimum "end-of-project" recycling rate of 75 percent for non-hazardous solid waste and a further goal of 90 percent diversion from landfills and incinerators by weight, including both demolition and construction waste. These goals exceed the minimum CALGreen requirement to divert 65 percent of construction and demolition waste from landfills. The proposed project would be required to implement a construction waste management plan to minimize the amount of construction waste that is disposed of in landfills in compliance with CALGreen and the District goals for construction waste reduction.

In compliance with state laws and programs to divert solid waste from landfills, the project would provide recycling and organic waste disposal options onsite. No new land use types are proposed that

would result in noncompliance with solid waste reduction goals or regulations. The District would continue to implement, promote and improve its comprehensive waste prevention, recycling, and diversion programs, and would apply applicable principles and procedures at the project site. Therefore, implementation of the proposed project would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. **Impacts would be less than significant**. No mitigation is required.

3.15.5 Cumulative Impact Analysis

The geographic scope for utilities and service systems is the service area for each utility provider. Although public utilities can be specific to jurisdictions, some service providers operate throughout the region and across multiple jurisdictions. Therefore, changes in development influence the demand for utilities across the region and could drive the need for new or expanded utility infrastructure.

3.15.5.1 New or Expanded Utilities

Cumulative development projects throughout the City could require new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Cumulative development projects within the City would be required to comply with City standards for the design, construction, and operation of stormwater, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure, including requirements for capacity studies to plan for capacity increases where multiple developments would result in the need for new mains or other infrastructure. Construction of utility connections for new development or replacement mains would occur in compliance with the City's Environmentally Sensitive Lands Regulations, Historical Resources Regulations, and other applicable Land Development Code requirements, as well as any additional project-specific mitigation measures identified during environmental review of these projects. As the project would not have significant impacts related to the relocation or construction of utilities, cumulative impacts would be **less than significant**.

3.15.5.2 Water Supplies

Cumulative development projects within the City could increase demand for water that is not accounted for in existing water supply planning documents if they are inconsistent with the growth projections and land use information that informs the UWMP. However, as future community plan updates, specific plans, or other focused plan amendments are proposed, water supply assessments would be prepared to evaluate the availability of water supply, which would ensure that the water demands of planned or proposed development are incorporated into the City's water supply projections and accommodated by additional sources of water. In addition, based on the UWMP, the City has adequate water supply for normal, dry, and multiple dry years, and the minimal increase in demand caused by the project in combination with cumulative development projects would not cause the City to have insufficient water supplies available. Cumulative impacts related to water supplies would be **less than significant**.

3.15.5.3 Wastewater

Cumulative development projects that are proposed within the City could result in the need for new or expanded wastewater treatment facilities as no specific plans for additional wastewater treatment facilities were included in the City's latest General Plan, and the associated EIR concluded impacts to wastewater treatment facilities would be significant. Individual cumulative projects would be required to comply with the San Diego Municipal Code, the City's Sewer Design Guidelines, and PUD's Capital

Improvement Program Guidelines and Standards, in addition to any additional project-specific mitigation measures. While PUD wastewater capacity planning is conducted on an ongoing basis to provide adequate wastewater facility capacity, without project-specific development plans to address future wastewater treatment demand from cumulative development projects, cumulative impacts associated with wastewater capacity would be significant (City 2024b). However, as implementation of the project would have a marginal increase in wastewater treatment compared to existing conditions, the contribution of the project to this impact **would not be cumulatively considerable**.

3.15.5.4 Solid Waste Generation

Similar to the project, cumulative development projects would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects in the City would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from existing landfills to preserve capacity. Additionally, citywide efforts to reach zero waste goals through the construction of new organics processing facilities would support landfill diversion and minimize demand on landfill capacity. Therefore, cumulative impacts associated with solid waste would be **less than significant**.

3.15.5.5 Solid Waste Regulations

Cumulative development projects proposed in the City would be required to comply with applicable state and City regulations regarding solid waste, including those intended to divert solid waste from landfills and citywide efforts to reach zero waste goals. Certain projects would also be required to prepare and implement waste management plans to the satisfaction of the City. As the project would comply with state and District policies related to solid waste, cumulative impacts associated with solid waste regulations would be **less than significant**.

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3.16 Wildfire

This section addresses the potential wildfire impacts that could occur during both construction and operation of the project. The existing conditions and regulatory setting related to wildfire are also addressed.

3.16.1 Environmental Setting

3.16.1.1 Climate

Southern California, including San Diego County (County) and the project site, is controlled largely by the large-scale meteorological condition that dominates the west coast of the U.S.: a seasonally semi-permanent high-pressure cell centered over the northeastern Pacific Ocean, called the Pacific high, which keeps most storms from affecting the California coast. Areas within 30 miles of the coast in the San Diego region, including the project site, experience moderate temperatures and comfortable humidity.

The predominant wind direction in the vicinity of the project site is from the west and the average wind speed is approximately 5.6 miles per hour (Iowa Environmental Mesonet 2026). The annual average maximum temperature in the project area is approximately 72.4 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56.2°F. Total precipitation in the project area averages 11 inches annually (Iowa Environmental Mesonet 2026).

3.16.1.2 Vegetation (Fuels)

The potential for wildland fires is a hazard where development occurs adjacent to open space or within close proximity to wildland fuels. Vegetation is important relative to wildfire as some vegetation, such as grassland habitats, are highly flammable, while other vegetation, such as chaparral and oak riparian forest, may be more difficult to ignite but would burn under more intense fire conditions. As discussed further in Section 3.3, *Biological Resources*, the project and its immediate surroundings are comprised of disturbed land and developed land. Maintained grassland areas associated with Montgomery-Gibbs Executive Airport (MYF) are located to the north and south of the project site.

3.16.1.3 Fire Hazard Classifications

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped recommended Fire Hazard Severity Zones for the County, and identifies responsibility areas for fire protection, including federal, state, and local responsibility areas. CAL FIRE maintains mapping datasets that estimate fire threat potential throughout California based on presence of flammable vegetation (e.g., fuel), topography, fire history, and climate. Based on these data, areas are mapped as Fire Hazard Severity Zones and assigned one of three levels of fire hazard: moderate, high, or very high. Local jurisdictions may adopt the recommended hazard maps prepared by CAL FIRE as recommended or may increase the identified hazard area; local agencies may not decrease the hazard area from that recommended by CAL FIRE. The City of San Diego (City) has adopted Very High Fire Hazard Severity Zone (VHFHSZ) maps that add to the hazard areas recommended by CAL FIRE for its local responsibility area (City 2025). The northern and eastern portion of the project site is within the VHFHSZ, as shown in Figure 3.16-1, *Wildfire Hazard Zone*. It is noted that the project site and its immediate surroundings were not recommended as a VHFHSZ by CAL FIRE (CAL FIRE 2026a).

Wildland Urban Interface areas are another designation given to areas of the state that are at risk of fire. The Wildland Urban Interface is a zone of transition between wilderness and human civilization that experiences a heightened risk of wildfire. The project site and its immediate surroundings are not within the Wildland Urban Interface (CAL FIRE 2025).

3.16.1.4 Fire History

Fire history information can provide an understanding of fire frequency, fire type, vulnerable areas, and significant ignition sources. It is noted that the fire history presented in this section relies on the Fire and Resource Assessment Program database, which summarizes fire perimeter data dating to the late 1800s but is incomplete because it only includes fires over 10 acres in size and does not have complete perimeter data, especially for the first half of the twentieth century (CAL FIRE 2026b). No fires have been recorded on the project site. The nearest recorded wildfire to the project site was approximately 0.7 miles northwest of the site and occurred in 1935 due to unknown/unidentified activity and burned approximately 3,678.4 acres (CAL FIRE 2026b). Although large fires have historically occurred in the region, including the 2003 Cedar Fire that burned approximately 270,686 acres and reached within two miles of the project site, the project site is within a heavily urbanized area where wildfires have been infrequent (CAL FIRE 2026b).

3.16.2 Regulatory Framework

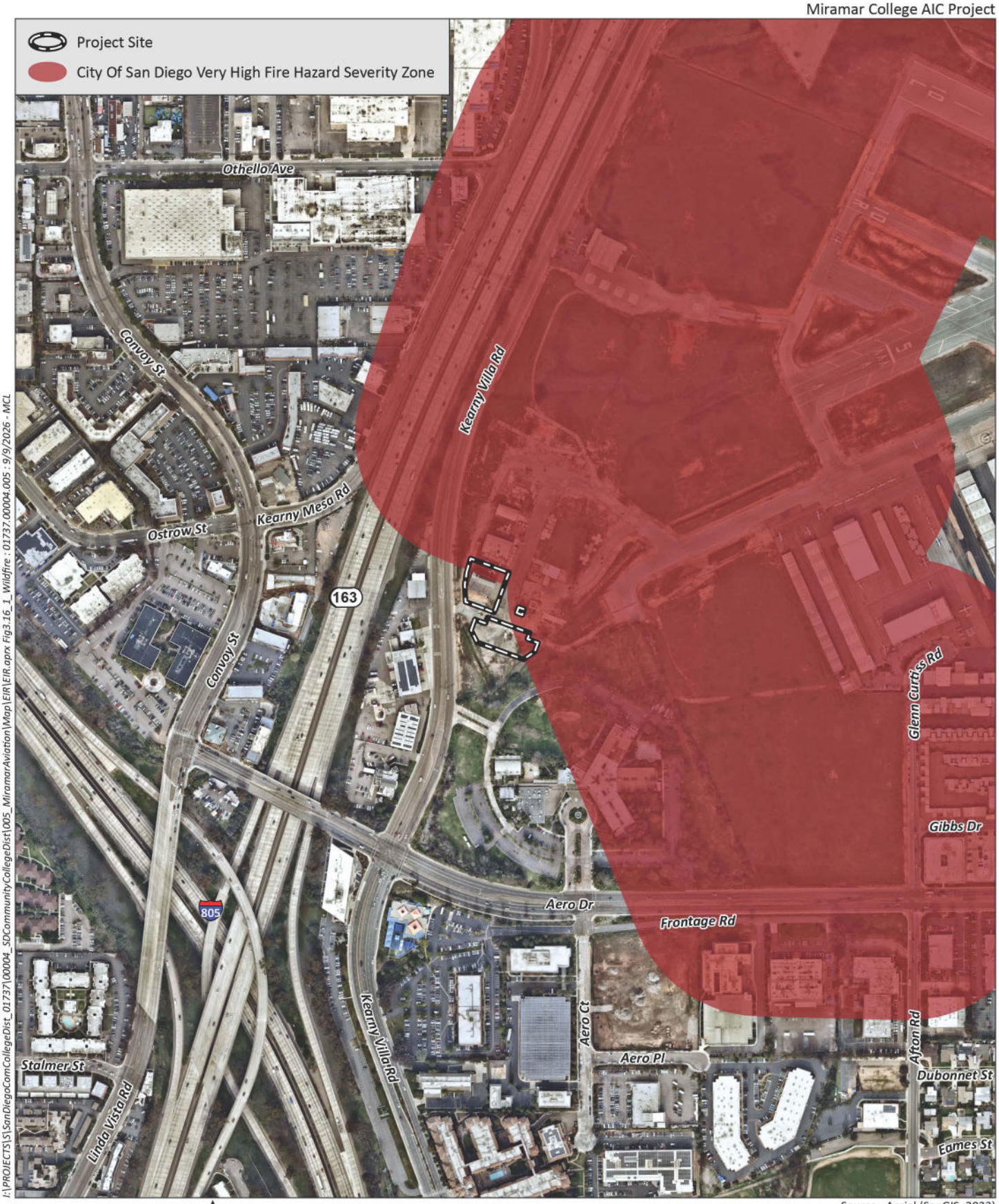
A summary of state, regional, District, and local regulations that pertain to wildfire is provided below. No federal regulations regarding wildfire apply to the project.

3.16.2.1 State

California Building Standards Code

Multiple parts of the California Building Standards Code (Title 24 of the California Code of Regulations [CCR]) address fire safety through building codes. The California Building Code (CBC), contained in Part 2 of Title 24, identifies building design standards, including fire protection systems and life safety standards for all buildings. Typical fire safety requirements of the CBC include the installation of fire sprinklers in all new high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and provision of smoke detectors. Updates in CBC Chapter 10 enacted in 2022 refined egress requirements to ensure safe evacuation during fire events. The enhancements focus on clearer pathways and improved access points for emergency response personnel to minimize evacuation time and ensure access for firefighting teams during emergencies.

Title 24, Part 7, Materials and Construction Methods for Exterior Wildfire Exposure, also known as the California Wildland Urban Interface Code (CWUIC) prescribes building materials and construction methods for new buildings in a VHFHSZ or Wildland Urban Interface. These standards establish requirements that enhance fire resistance and mitigate fire spread from wildfires into developed areas to reduce the likelihood of property or life loss during fires. Part 7 contains building material requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other standards require exterior defensible space, adequate water supply for firefighting, and a fire protection plan.



0 500 Feet

Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Wildfire Hazard Zone

Figure 3.16-1

The California Fire Code (CFC), Title 24, Part 9, incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. The CFC standards enhance safety and accessibility for firefighters and other emergency responders during emergency events.

California Public Resources Code

Fire Hazard Severity Zones

Public Resources Code (PRC) Sections 4201 through 4204 apply to State Responsibility Areas, and Government Code Sections 51175 to 51189 direct CAL FIRE to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The Fire Hazard Severity Zone maps are used to direct the application of various mitigation strategies to reduce the risk associated with wildland fires. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with higher hazard category sites including steep terrain, unmaintained fuels/vegetation, and Wildland Urban Interface locations. CAL FIRE also provides fire hazard designation recommendations for local jurisdictions based on these data. Projects situated in VHFHSZs require fire hazard analysis and application of fire protection measures that have been developed to specifically result in defensible communities.

California Strategic Fire Plan

The California Strategic Fire Plan, developed and adopted in response to PRC Sections 4114 and 4130, is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. By placing emphasis on what needs to be done long before a fire starts, the California Strategic Fire Plan looks to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan has a vision for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire. These goals would be achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2018).

3.16.2.2 Regional

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The purpose of the County's Multi-Jurisdictional Hazard Mitigation Plan (County 2023) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. In order to qualify for hazard mitigation funding, this type of plan is also required by the federal Disaster Mitigation Act of 2000. The plan was last revised in 2023 to reflect changes to the hazards threatening San Diego County and the programs in place to minimize or eliminate those hazards. An important component of the plan is the Community Emergency Response Team, which educates community members about disaster preparedness and trains them in basic response skills, such as fire safety, light search and rescue, and disaster medical operations. The Multi-Jurisdictional Hazard Mitigation Plan is a collaborative effort among various jurisdictions within the County, and it includes input and coordination with local entities, including the City of San Diego Fire-Rescue Department (SDFD).

County of San Diego Emergency Operations Plan

The County's Emergency Operations Plan was approved in August 2022 and provides a framework for emergency response within the County. The Emergency Operations Plan outlines procedures for safe and effective evacuation during emergencies, including the importance of identifying evacuation routes and ensuring public awareness of these routes through communication systems. The Emergency Operations Plan also outlines roles and responsibilities for law enforcement, fire service, and public health personnel during emergencies to streamline evacuation and emergency response efforts.

The Emergency Operations Plan dictates who is responsible for a large-scale evacuation effort and how regional resources will be requested and coordinated (County 2022). First responders are responsible for determining initial protective actions before the Emergency Operations Center and emergency management personnel have an opportunity to convene and gain situational awareness. Initial protective actions are shared and communicated to local Emergency Operations Centers and necessary support agencies as soon as possible to ensure an effective, coordinated evacuation. During an evacuation effort, the designated County Evacuation Coordinator is the County Sheriff, who is also the Law Enforcement Coordinator. The County Evacuation Coordinator is assisted by other law enforcement and support agencies. While the District is not a signatory to the Emergency Operations Plan, this plan is relevant to regional response efforts that involve mutual aid between jurisdictions. The SDFD, which serves as the fire protection agency for the project site, is part of the mutual aid network outlined in the Emergency Operations Plan.

3.16.2.3 District

District Design Guidelines and Standards Manual

Design Guides and Standards

Section 2.1, *Design Guides and Standards*, of the District Design Guidelines and Standards Manual includes guidelines for the design of facilities on the District campuses. Related to wildfire, all District facilities are required to be designed and constructed in compliance with the CFC, including requirements for fire resistant wall assemblies. Fire access roads are also required to meet the standards of the CBC.

Projects are required to provide a fire accessibility site plan showing features such as access gates, fire hydrants, and sprinkler risers. A fire flow test from the six months prior to submittal to the Division of the State Architect (DSA) is also required to demonstrate adequate fire flow is available. DSA also requires a local fire authority review approval of the fire accessibility site plan.

San Diego Community College District Board Policies

Board Policies 3505 (Emergency Response Plan) and 7415 (Fire, Earthquake, and Disaster Safety) direct the Chancellor to establish procedures that ensure that the District implements a plan to be activated in the event of an emergency or the occurrence of a natural disaster or hazardous condition. This plan must comply with the National Incident Management System and the Standardized Emergency Management System, and should incorporate the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, and other relevant programs. The plan must also identify training requirements for District employees depending on their assigned roles within the emergency plan.

The communications requirement of this Board Policy is implemented by Administrative Procedure 7415.2 (Emergency Communications), which establishes specific procedures to ensure dissemination of information to students, employees, and the community in a consistent and effective manner in the event of an emergency. The Emergency Communications Response Plan defines what qualifies as an emergency, identifies who is responsible for initiating notifications, and specifies the communication systems that may be used, such as mass-notification platforms capable of delivering calls, texts, and emails. Following an emergency, the District Chancellor and/or President would reconvene the emergency team and review the process and situational response for continuous improvement of the District's emergency response.

Miramar College Emergency Plan

The Emergency Plan prepared for San Diego Miramar College establishes how the District will use the Standardized Emergency Management System to organize and respond to emergencies at any District-owned site. The Emergency Plan assigns a Site Incident Commander to coordinate operations and direct a designated Command Team. The District Police Department develop, maintain, and annually review the plan to ensure compliance, while the Site Incident Commander oversees training for new employees and conducts yearly emergency exercises. The Emergency Plan provides a consistent District-wide structure so employees understand their responsibilities regardless of location and emphasizes that all staff must review the plan twice a year (Miramar College 2023).

3.16.2.4 Local

City of San Diego Municipal Code

Section 142.0412 of the San Diego Municipal Code sets forth brush management requirements to reduce the risk of fire hazards. Brush management is required on publicly or privately owned land that is within 100 feet of a structure and contains native or naturalized vegetation. Three defensible space zones are established. The Building Ignition Resistance Zone is a 5-foot-wide space extending out from the exterior building wall where no combustible materials are allowed. Brush Management Zone One extends from 5 to 35 feet from exterior walls. All native vegetation must be removed and replaced by approved and irrigated landscaping. Brush Management Zone Two extends 35 to 100 feet from exterior walls. Within Zone Two, 50 percent removal of native vegetation and 50 percent thinning of remaining vegetation is required; Zone Two is required to be maintained on a regular basis by pruning and thinning plants, removing invasive species, and controlling weeds.

3.16.3 Thresholds of Significance

Thresholds used to evaluate potential wildfire impacts are based on CEQA Guidelines Appendix G. A significant wildfire impact could occur if implementation of the proposed project would occur within or near state responsibility areas or lands classified as VHFHSZs and would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;

2. 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;

3. 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; or

4. 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.

As described in Section 3.16.1.3 and shown in Figure 3.16-1, the northern and eastern portion of the project site is within VHFHSZ areas mapped for a Local Responsibility Area. Therefore, each of the Appendix G thresholds apply to the project location and potential effects of the project are evaluated in the following impact analysis.

3.16.4 Impact Analysis

3.16.4.1 Emergency Plans

Threshold 1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Discussion

Construction of the project would not substantially impair emergency response or evacuation plans, which direct evacuation towards major City roads. As discussed further in Section 3.8.1.3, the evacuation routes near the project site identified by the County's Office of Emergency Services include Kearny Villa Road, Aero Drive, and I-5 (County 2024). The project would require work within the City right-of-way (ROW) involving the construction of connections to existing City-owned utility lines located in Kearny Villa Drive to the west of the project site, including water and fire water. For this work within the City ROW, the District would be required to obtain and comply with the condition of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan in accordance with City policies to ensure emergency access is maintained on City streets. Therefore, during construction, the project would not impair emergency response or evacuation plans.

Once operational, the project would not conflict with emergency response or evacuation plans. The District has developed its Emergency Communications Response Plan (Administrative Procedure 7415.2) which implements Board Policy 7415, Fire, Earthquake and Disaster Safety, to ensure dissemination of information to students, employees, and the community in a consistent and effective manner in the event of an emergency. In addition, the Miramar College Emergency Plan is developed, maintained, and annually reviewed by the District Police Department to ensure compliance and involves training for new employees and yearly emergency exercises. See Section 3.16.2.3 above for additional information about these emergency response plans and programs. No impairment of these plans would occur as a result of project implementation.

As discussed further in Section 3.12, *Public Services*, emergency response to the project site would involve the SDFD and/or police services from San Diego Police Department (SDPD) and the District Police Department, depending on the nature of the emergency. Although the project would involve the expansion of the instructional space on the site and the lease area, the project site is within an area that is previously served by the SDFD and the District Police Department. The project would have an evacuation plan in accordance with criteria outlined in the District Design Guidelines and Standards

Manual and be incorporated into the overall evacuation zone framework established for the Miramar College campus. In addition, as discussed further in Section 3.16.4.2 below, the project would incorporate the required fire safety elements and would not exacerbate wildfire risks. Therefore, operation of the project would not impair an adopted emergency response plan or emergency evacuation plan. **Impacts would be less than significant**. No mitigation is required.

3.16.4.2 Wildfire Risks

Threshold 2: Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact Discussion

During construction of the project, the project contractor would be required to comply with applicable state regulations in place to reduce the risk of construction-related fire events. Chapter 33 of the CFC includes requirements that would be implemented during the demolition and construction phases, such as developing and implementing a written plan for fire prevention, maintaining accessibility for fire apparatus, the provision of fire extinguishers on the construction site, and vegetation management on the project site.

The project would be constructed in accordance with applicable regulations intended to protect occupants and buildings from fire events. At the state level, this would include compliance with the California Building Standards Code, which requires the use of ignition-resistant materials, the installation of automatic fire sprinkler and alarm systems, defensible space establishment, and the inclusion of fire access roads. As the project site is partially located within a VHFHSZ, adherence to the CWUIC would be required. At the District level, the project would be required to comply with the fire-related requirements in the District Design Guidelines and Standards Manual, including the development of a project-specific fire accessibility site plan and fire flow data report with approval by the DSA, compliance with CFC requirements for interior finishes, and compliance with the CBC fire access road requirements.

As discussed further under Section 3.16.4.4 below, the potential for landsliding or slope instability on the project site is considered low. In addition, the project site is surrounded by existing development and the project would not result in construction of buildings in previously undeveloped, natural areas where fire risk is highest. As discussed in Section 3.16.1.1, the average wind speed in the vicinity of the project site is approximately 5.6 miles per hour, though stronger winds can occur during weather events. The project would not exacerbate wildfire risks due to slopes or wind and, rather, would be constructed to current fire safety standards. The project would not exacerbate wildfire risks such that it would expose project occupants to substantial fire-related effects, and **impacts would be less than significant**. No mitigation is required.

3.16.4.3 Infrastructure Installation

Threshold 3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact Discussion

The proposed project would involve the provision of internal accessways, pedestrian walkways, and other infrastructure improvements throughout the project site. In addition, connections to electricity and water for the project would be required. However, these utilities would be connected to existing infrastructure and would not represent an extension of infrastructure within an undeveloped area that would exacerbate fire risks. In addition, as described further in Section 3.15, *Utilities and Service Systems*, these facilities are part of the proposed project and the potential impacts of their construction are considered throughout this EIR. Furthermore, the eastern portion of the project site is located within a VHFHSZ and would therefore be required to comply with the requirements outlined in Chapter 7A of the CBC, which would further reduce fire risk associated with the project. Implementation of the project would not require the installation of infrastructure that may exacerbate fire risk, and **impacts would be less than significant**. No mitigation is required.

3.16.4.4 Post-Fire Risks

Threshold 4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact Discussion

Wildfires can greatly reduce the amount of vegetation on hillsides. Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. The project area is generally flat and surrounded by developed land with minimal areas of open vegetation; therefore, landslides are not anticipated to occur on or near the project site, and the risk of post-fire instability within and surrounding the site would be minimal. In addition, as discussed in Section 3.6, *Geology and Soils*, and Section 3.9, *Hydrology and Water Quality*, the development of the proposed project would not result in significant changes to runoff, slope stability, landslides, erosion, or drainage. These conditions would not be substantially altered in the event of wildfire within or near the project site, and the project would not expose people or structures to significant post-fire risks. **Impacts would be less than significant**. No mitigation is required.

3.16.5 Cumulative Impact Analysis

The study area for the assessment of cumulative impacts related to emergency evacuation plans is the City, as emergency plans and evacuation routes are established on a citywide scale. The study area for cumulative impacts related to wildfire risks, infrastructure installation, and post-fire risks would be more localized and would include the Kearny Mesa community planning area.

3.16.5.1 Emergency Plans

Construction of future cumulative development projects in the City could result in interference with emergency response or evacuation plans during temporary construction activities that block access routes. Once operational, such projects would also be required to provide adequate emergency access in accordance with the CFC and CBC. However, no cumulative projects are reasonably anticipated to result in permanent changes to the nearby highways and arterials such that access to existing emergency evacuation routes would be eliminated. Development within the project site would not physically interfere with emergency response or evacuation plans because the project would not include features that prevent continued implementation of these plans. In addition, the project would be required to establish and maintain emergency access on the project site in accordance with CBC requirements and along Kearny Villa Road in accordance with the project's Traffic Control Plan. Similarly, cumulative development projects within the City would be required to comply with relevant state and City policies related to fire safety and circulation under the City's Right-of-Way Permit and associated Traffic Control Plan to ensure that emergency access is maintained during construction. Therefore, cumulative impacts related to emergency response and evacuation plans would be **less than significant**.

3.16.5.2 Wildfire Risks

Similar to the proposed project, cumulative development projects within the Kearny Mesa community planning area could be located within or adjacent to VHFHSZs. Cumulative development projects within the City would be required to adhere to all regulatory requirements in place to minimize wildfire hazards due to construction in these areas, including compliance with the SDFD fire safety during construction and demolition standards (SDFD 2025) in addition to relevant sections of the CFC, CWUIC, and CBC. As described in Section 3.16.4.2 above, the project would not exacerbate wildfire risk based on site-specific factors or the proposed development type. Therefore, cumulative impacts related to wildfire risks would be **less than significant**.

3.16.5.3 Infrastructure Installation

Cumulative development projects could require the installation or maintenance of infrastructure that could exacerbate fire risk. Environmental impacts associated with infrastructure improvements, including any required features to address fire safety such as roads, fuel breaks, emergency water sources, or utilities would be evaluated in the respective environmental documents for discretionary projects. As discussed in Section 3.16.4.3, the project would not result in environmental impacts related to the installation of infrastructure beyond those described throughout this EIR. As such, cumulative impacts related to fire-related infrastructure installation would be **less than significant**.

3.16.5.4 Post-Fire Risks

Cumulative development projects proposed within the Kearny Mesa community planning area could be located on sites that are subject to downslope or downstream flooding or landslides. Similar to the

project, the cumulative development projects would be subject to CBC and local geotechnical requirements that are developed for the purpose of ensuring that habitable structures are not sited in unsafe areas, such as those subject to landslides or flooding. Potential impacts related to downslope or downstream flooding or landslides would be evaluated in the respective technical reports and environmental documents for discretionary projects and design measures to reduce post-fire risk would be incorporated into project designs. As discussed in Section 3.16.4.4, the project would not 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. Therefore, cumulative impacts related to post-fire risks would be **less than significant**.

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4.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why possible environmental effects of a project were found not to be significant and, therefore, were not discussed in detail in the EIR. Project impacts associated with Agriculture and Forestry Resources, Mineral Resources, Population and Housing, and Recreation were determined not to be significant. A brief explanation indicating the reasons that the effects on these resources would not be significant is provided under each subheading below.

4.1 Agriculture and Forestry Resources

The project site is developed with non-agricultural uses and is designated as Urban and Built-up Land by the California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (DOC 2022a). The project site does not contain areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, land that comprises the project site is not enrolled in Williamson Act contracts (DOC 2022b) and is not zoned by the City of San Diego (City) for agricultural use. As such, the project would not result in the conversion of designated farmland, Williamson Act contract lands, or land otherwise used for agricultural purposes to non-agricultural uses.

The existing project site does not contain forestlands, timberlands, or timberland zoned Timberland Production. Moreover, there is no land zoned as forest land or timberland that exists within the project site or its vicinity. The area surrounding the project site includes open space, civic, airport, and commercial uses. The open space to the northeast and southeast of the site does not constitute forestland and is not used for timber production. Therefore, the project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. **No impacts to agriculture and forestry resources would occur**.

4.2 Mineral Resources

The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZs), according to known or inferred mineral resource potential. As such, the DOC classifies the availability of mineral resources in a region into one of four MRZ categories: MRZ-1 for no mineral resources, MRZ-2 for significant resource areas with known quality and quantity, MRZ-3 for significant resource areas of unknown quality and quantity, and MRZ-4 for areas with no information. According to the California Geological Survey's (CGS's) Mineral Land Classification Map, the project site and its vicinity are classified as MRZ-3, indicating that the presence or significance of mineral resources cannot be determined (CGS 2017). While there is potential for mineral deposits to occur in the project vicinity, the project site is not used for mineral extraction, is not known or designated as a locally important mineral resource recovery site and is not designated for mineral extraction uses. The project site is developed with instructional and aviation uses and is located within the boundaries of the Montgomery-Gibbs Executive Airport (MYF) that would be incompatible with mineral extraction within the project site. Therefore, development of the project would not result in the loss of availability of a regionally or locally important mineral resource. **No impacts to mineral resources would occur**.

4.3 Population and Housing

The project would provide an expanded instructional facility for the Aviation Operations Program offered at Miramar College. The project would be comprised of aviation instructional uses similar to existing conditions. The expanded facility would allow for an additional 15 class sessions per week to occur (three class sessions per day), for a total of 28 class sessions per week with each class session containing an average of 23 students. However, it is anticipated that this enrollment growth would occur as a result of an increase in students from the project region, as community colleges are generally designed to target and serve local communities. Increases in enrollment would be expected to come from the existing and projected regional population and would not draw new people to the region. The Aviation Operations Program at Miramar College would continue to serve the regional population as it grows and would not induce substantial regional population growth. Further, the project does not propose new housing that would result in a direct increase in the regional population.

In addition, the project would not indirectly induce population growth as no extension of infrastructure is proposed that would allow for future development where it does not currently occur. The project would connect to existing utilities, including water, sewer, electricity and telecommunication services. The surrounding area is already developed with urban uses and infrastructure, and the connection to existing infrastructure would not provide new utilities or other infrastructure to support growth in a previously undeveloped area. Therefore, the project would not indirectly induce substantial population growth. **No impacts to population and housing would occur**.

4.4 Recreation

As discussed above, the project would not cause a direct increase in population and, therefore, would not result in a long-term increase in the use of the existing campus and City parks and recreational facilities and programs. The project proposes an expanded instructional facility and supporting facilities and would not involve the construction of any recreational facilities. Therefore, the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. **No impacts to recreation would occur**.

5.0 OTHER CEQA-REQUIRED SECTIONS

This section includes CEQA considerations not contained elsewhere in this EIR that are required to be included per CEQA Guidelines Section 15126. Specifically, discussions of significant irreversible environmental effects (CEQA Guidelines Section 15126[c]) and growth-inducing impacts (CEQA Guidelines Section 15126[d]) are provided in this section. A summary of significant and unavoidable environmental effects, as required by CEQA Guidelines Section 15126(b), is provided in this section based on the impact determinations provided in Section 3.0, *Environmental Analysis*, which provides further discussion of these impacts and also provides discussion meeting the requirements of CEQA Guidelines Section 15126 (a) and (e). Alternatives to the proposed project are discussed in Section 6.0, *Project Alternatives*, to meet the requirements of CEQA Guidelines Section 15126(f).

5.1 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires an EIR to describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less than significant level. Section 4.0, *Effects Not Found to Be Significant*, of this EIR analyzes and discusses the CEQA environmental topics where the project would not have a significant impact. Section 3.0, *Environmental Analysis*, of this EIR identifies the potential environmental impacts of the project and recommends mitigation measures to reduce impacts, where feasible. As described further in Section 3.4, *Cultural Resources*, the project would have a significant impact related to the proposed demolition of a historic resource that would remain significant and unavoidable even with the incorporation of mitigation measures. Additional discussion of these impacts is provided in the relevant sections of Section 3.0, *Environmental Analysis*.

5.2 Significant and Irreversible Effects

CEQA Guidelines Section 15126.2(d) requires a discussion of significant irreversible environmental changes that would be caused by a proposed project. Per CEQA Guidelines Section 15127, irreversible changes are only required to be addressed in EIRs when connected with the adoption, amendment, or enactment of a local plan, policy, or ordinance of a public agency; adoption by a local agency formation commission of a resolution making determinations; or when a project is subject to the National Environmental Policy Act and requires an Environmental Impact Statement. The project proposes an update to the MYF Airport Layout Plan, thus, consideration of irreversible environmental changes is required.

CEQA Guidelines Section 15126.2(d) further notes that significant and irreversible environmental changes may occur as a result of the use of nonrenewable resources during the initial and continued phases of a project since a large commitment of such resources makes removal or nonuse thereafter unlikely. Irreversible environmental changes typically fall into one of the following three categories: primary impacts, meaning the use of nonrenewable resources for a project; secondary impacts, such as highway or roadway improvements that provide access to a previously inaccessible area, thereby committing future generations to similar uses; and environmental accidents resulting in environmental changes. CEQA Guidelines Section 15126.2(d) states that irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified.

5.2.1 Irreversible Commitment of Resources

The proposed project would include the demolition of the existing 6,300 square foot (SF) Miramar Hangar and construction of the approximately 18,000 SF Miramar College AIC and associated parking area and utility infrastructure on a 1.06-acre site. Construction of the proposed project would require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the project because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of the project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the project.

Construction of the project would also result in the use of nonrenewable resources, including building materials (e.g., concrete asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the project site and the transportation of construction workers to and from the project site (e.g., natural gas, gasoline, diesel fuel, and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base. However, the recycling of these resources for project construction cannot be assured, and the project should be considered to result in an incremental increase in the demand for nonrenewable construction materials and fuels.

During project operation, the project would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. Long-term energy resources include fuel consumed for the heating and cooling of buildings, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during operation would increase the consumption of oil and coal. Accordingly, this represents a long-term commitment to the continued consumption of these resources. While statewide energy resources are increasingly generated by renewable resources, the project would not solely rely on renewable energy resources and would incrementally increase long-term demand for nonrenewable energy resources. As discussed in Section 3.5, *Energy*, of this EIR, the project would not result in significant impacts related to wasteful use of energy, including fuel consumption, and electricity or natural gas use.

5.2.2 Irreversible Environmental Changes

Implementation of the proposed project would result in irreversible environmental changes. Irreversible environmental changes are typically associated with the environmental topics of agricultural and forestry resources, biological resources, cultural resources, paleontological resources, mineral resources, and tribal cultural resources.

The project site is currently developed, and no agricultural, forestry, or mineral resources occur on the site. As such, implementation of the project would not result in irreversible changes to agricultural and forestry resources or mineral resources. Further discussions of project impacts related to these resources are provided in Section 4.0, *Effects Found Not to be Significant*.

As identified in Section 3.3, *Biological Resources*, the project would implement mitigation measures BIO-1 through BIO-6, which would reduce impacts to sensitive species to below a level of significance. In

addition, no sensitive habitats were identified on the project site. Therefore, no substantial loss of habitat or special-status species would occur.

The project site is developed with the existing Miramar Hangar on the northwestern portion of the project site. As discussed in Section 3.4, *Cultural Resources*, the existing Miramar Hangar located on the project site and adjacent Buildings 6 and 7 are significant under NRHP Criterion A at the local level. As the proposed project would result in the demolition of the Miramar Hangar, direct impacts to historical resources (built environment) are identified as potentially significant. Therefore, the project would implement mitigation measure HIST-1 to reduce potential impacts on historic resources to the extent feasible. However, impacts to historical resources (built environment) would remain significant and unavoidable, and the project would result in irreversible environmental changes to historic resources.

As discussed in Section 3.4, the entire project site is considered to have low archaeological sensitivity. Implementation of the project would not cause a substantial adverse change in the significance of an archaeological resource. As discussed in Section 3.14, *Tribal Cultural Resources*, although the project site has been determined to have low sensitivity for tribal cultural resources, based on consultation efforts, in the unlikely event that tribal cultural resources are uncovered during project activities. However, implementation of mitigation measure TCR-1 would reduce impacts related to the discovery of previously unknown tribal cultural resources or cultural resources of tribal significance to below a level of significance. As such, no irreversible changes to archaeological or tribal cultural resources would occur.

With regard to paleontological resources, the project site is entirely underlain by Very Old Paralic Deposits (Unit 8) which are characterized by a moderate paleontological resource sensitivity rating. Additional discussion of impacts related to paleontological resources is provided in Section 3.6, *Geology and Soils*, which concludes the project does have the potential to disturb or destroy unique paleontological resources. As such, the project would implement mitigation measures GEO-1 through GEO-3 which would require paleontological monitoring and treatment and reporting procedures should any fossils be discovered during ground disturbing activities. With implementation of this mitigation framework, potential impacts to paleontological resources would be reduced to below a level of significance, and irreversible changes to paleontological resources would not occur as a result of the project.

The project would involve the creation of a new internal driveway to provide access to the proposed parking areas on the project site but would not involve road or highway improvements that would provide access to previously inaccessible areas. Installation of sidewalks and pathways along internal roadways would provide improved connectivity in the project area where existing pedestrian access already exists. As such, the project would not result in significant irreversible secondary impacts.

5.2.3 Potential Environmental Damage from Accidents

Project construction would involve the on-site use and/or storage of hazardous materials/wastes such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these materials would occur in accordance with California Division of Occupational Safety and Health guidelines and would be disposed of in accordance with California Department of Toxic Substances Control (DTSC), District, and City of San Diego (City) regulations. Regulated materials would be properly handled, used, stored, transported, and/or disposed of in accordance with applicable regulatory

standards. The project would not involve the installation of landscaping on the project site and therefore would not involve the application of fertilizers, pesticides, or herbicides.

As described in Section 3.8, *Hazards and Hazardous Materials*, hazardous construction material storage and staging would be managed by the project specific Stormwater Pollution Prevention Plan (SWPPP), and existing federal, state, and District standards and regulations in place for the handling, storage, and transport of these materials would be complied with. Due to the age of the Miramar Hangar, there is potential for the presence of lead-based paints (LBPs) or asbestos-containing materials (ACMs) and proposed demolition activities could result in the release of LBP and ACMs. As detailed in the District Standards and Guidelines Manual, a hazardous materials survey is required to identify materials that require specialized handling prior to demolition of a District building, and if hazardous materials are identified, the District would employ a contractor licensed for abatement and removal of the identified hazard and comply with all applicable regulations. Once operational, the storage and use of hazardous materials by the project would be subject to the applicable regulations to prevent potential accident conditions. Therefore, the potential for the proposed project to cause significant irreversible environmental damage from an accident or upset of hazardous material would be less than significant.

The project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. To address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, the project would comply with engineering and design parameters in accordance with the most recent edition of the California Building Code (CBC).

5.3 Growth Inducing Impacts

CEQA Guidelines Section 15126(d) requires that an EIR discuss a project's potential impacts related to growth inducement. CEQA Guidelines Section 15126.2(e) further states that an EIR should describe the ways in which a proposed project could directly or indirectly foster economic growth, population growth, or additional housing, and how that growth would affect the surrounding environment.

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within a region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 5.3.1 through 5.3.3 below.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in that community.

5.3.1 Direct Population Growth

Refer to Section 4.0, *Effects Found Not to be Significant*, of this EIR for additional discussion of population and housing impacts associated with the project. As discussed therein, the project would allow for an additional 15 class sessions per week to occur (three class sessions per day), for a total of 28 class sessions per week with each class session containing an average of 23 students. However, it is anticipated that this enrollment growth would occur as a result of an increase in students from the

project region, as community colleges are generally designed to target and serve local communities. Increases in enrollment would be expected to come from the existing and projected regional population and would not draw new people to the region. The Aviation Operations Program at Miramar College would continue to serve the regional population as it grows and would not induce substantial direct regional population growth. Further, the project does not propose new housing that would result in a direct increase in the regional population. The physical environmental impacts associated with the proposed project's construction and operation as an instructional facility are analyzed in Sections 3.1 through 3.16 of this EIR. The analysis has demonstrated that there are adequate services available to serve the project.

5.3.2 Economic Growth

The project would involve the demolition of the existing Miramar Hangar and construction of an upgraded and modernized hangar to accommodate the projected enrollment increases at Miramar College in their Aviation Operations Program. Construction of the project would involve additional construction employment opportunities. Given the relatively common nature and scale of the project, the demand for construction employment is anticipated to be met within the existing and future labor market in the region. The size of the construction workforce would vary during the different stages of construction but would not be of a size such that a substantial number of laborers from outside of the County would relocate for these employment opportunities. The District also specifically prioritizes hiring construction contractors from the local workforce pursuant to its Community Benefits Agreement with the San Diego Building and Construction Trades Council and many craft unions. Once the project is operational, it is anticipated that the increased enrollment that the project would support would occur as a result of an increase in students and employees from the project region, as community colleges are generally designed to target and serve local communities. Therefore, increases in enrollment are expected to come from the existing and projected regional population and would not draw new people to the region. No significant physical effects are anticipated to result from economic growth generated by the project.

5.3.3 Removing Obstacles to Growth

The removal of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service and/or utility infrastructure. A project could trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure to an area that was previously not available. A regulatory obstacle to growth typically involves a change in zoning or land use regulations that allow for an increase in growth.

The project is located in a developed area served by existing public utilities and services. The project does not include any extension or expansion of public services beyond connections or upgrades to the existing infrastructure in the immediate vicinity that are required to serve the project. The project would connect to existing water and fire water service located within Kearny Villa Road. The project would additionally connect to the existing sewer main located on the project site and would construct on-site stormwater drainage and detention basins on-site. Water and sewer service in the project area is provided by the City and would serve the project. Solid waste disposal for the project site would be taken to a landfill with sufficient capacity. The project would not result in the need for new or physically altered facilities related to fire services, police services, schools, or libraries. Refer to Sections 3.12, *Public Services*, and 3.15, *Utilities and Service Systems*, for further details.

The project would involve the construction of new accessible pedestrian walkways and a paved internal driveway and parking area in a similar location to the existing driveway and parking area. These circulation improvements are additions to the existing circulation system that would improve safety and connectivity but would not provide access to previously inaccessible areas such that they would facilitate future development elsewhere. As such, proposed roadway improvements would not trigger growth in the area.

As stated in Sections 5.3.1 and 5.3.2 above, the population and economic growth induced by the project would not be significant. The project would not involve any land use or zoning changes and would not involve additional regulatory actions that would remove obstacles to growth within the project region.

Based on the above, the project would not remove obstacles to growth by extending infrastructure to new areas or allowing for additional development via new regulations, nor would it result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure such as water supply facilities, wastewater treatment plants, roads, or freeways. The project would not remove obstacles to growth resulting in growth beyond that proposed by the project.

6.0 PROJECT ALTERNATIVES

6.1 Introduction

CEQA Guidelines Section 15126.6(a) requires that an EIR describe and evaluate a range of reasonable alternatives to a proposed project, or alternatives to the location of a proposed project. The purpose of the alternatives analysis is to explore ways that most of the basic objectives of a proposed project could be attained while reducing or avoiding significant environmental impacts of the project as proposed. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered. CEQA Guidelines Section 15126.6(f) specifies that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The Lead Agency is responsible for selecting a range of alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This approach is intended to foster informed decision making and public participation in the environmental process.

The CEQA Guidelines state that the discussion of alternatives should focus on alternatives "which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (CEQA Guidelines Section 15126.6[b]). An EIR is not required to consider alternatives that are infeasible, have effects that cannot be reasonably ascertained, or are remote and speculative. The determination of feasibility may be based on factors such as site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries (CEQA Guidelines Section 15126.6[f][1]). Additionally, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative that describes what would reasonably be expected to occur on the project site in the foreseeable future if the proposed project were not approved. Based on the alternatives analysis, an environmentally superior alternative is to be identified.

In developing the project alternatives to be addressed in this EIR, potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project. An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the project (CEQA Guidelines Section 15126.6[d]). Accordingly, this section covers a reasonable range of feasible alternatives that focus on avoiding or substantially lessening significant effects of the project, even if the alternatives would not attain all of the project objectives or would be more costly.

6.2 Project Objectives

An EIR must only discuss in detail alternatives that are capable of feasibly attaining most of the basic objectives associated with the project, while at the same time avoiding or substantially lessening the significant environmental effects associated with the project. As stated in Section 2.3, *Project Objectives*, of this EIR, the following are the primary objectives of the proposed project:

1. Expand and upgrade the existing instructional space to allow for segmented classroom, office, storage, pilot debrief, and air traffic control spaces to improve the student and faculty experience and provide for the anticipated growth of the Aviation Operations Program at Miramar College.

2. Meet regional workforce needs through the provision of an educational space that promotes high-quality hands-on aviation experience within an existing airport setting to prepare students for employment in an aviation-related career field.

3. Provide a modernized instructional space to align with current building codes related to structural integrity, safety, and accessibility.

4. Minimize the loss of instructional space and interruptions to the Aviation Operations Program during construction by providing an adequate off-site location for continued instruction.

5. Incorporate sustainability features to align with state climate targets and the California Community Colleges Chancellor's Office directives related to greenhouse gas emissions reduction, energy efficiency, resource conservation, and green building standards.

6.3 Significant Environmental Effects of the Project

Alternatives considered under CEQA should avoid or substantially lessen one or more significant environmental impacts that would occur with implementation of the project as proposed. As such, this alternatives analysis focuses on the issues discussed in EIR Sections 3.1 through 3.16 where the project was found to have the potential to result in significant impacts on the environment related to these topics. Environmental issues where there was determined to be no impact or a less than significant impact, including those discussed in Section 4.0, *Effects Found Not to be Significant*, are not carried forward into this alternatives analysis because it was determined that there is no potential for the project to result in significant impacts to these resources. Accordingly, the alternatives would not avoid or substantially lessen environmental impacts associated with these resources and no further analysis is warranted.

The alternatives analysis focuses on the issue areas where the analysis provided in EIR Sections 3.1 through 3.16 concludes that there would be a significant and unavoidable impact or less than significant impact with mitigation. In summary, the proposed project would result in significant but mitigated impacts for the following environmental issue areas:

- Biological Resources (Special-Status Species)
- Geology and Soils (Paleontological Resources)
- Noise (Increase in Ambient Noise Levels, Ground-Borne Vibration, Airport Noise Exposure)

Mitigation measures identified in this EIR would reduce the impacts listed above below a level of significance. However, one significant impact would remain despite implementation of mitigation to the extent feasible:

- Cultural Resources (Historic Resources)
- Land Use and Planning (Conflict with an Applicable Land Use Plan or Policy)

Impacts related to all other environmental issue areas were determined to be less than significant or not impacted by the project.

6.4 Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(c) requires that an EIR identify alternatives that were considered and rejected as infeasible, and briefly explain the reasons for their rejection. Alternatives considered but rejected from further study for the project include two no demolition alternatives (hangar reuse and hangar movement), and three alternative location alternatives (other location on the Montgomery-Field Executive Airport [MYF] property, on a different airport property, and off airport property).

Pursuant to CEQA Guidelines Section 15126.6(c), factors that may be used to eliminate alternatives from detailed consideration may include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts. Feasible is defined in Public Resources Code (PRC) Section 21061.1 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."

6.4.1 No Demolition Alternatives

As discussed in Section 3.4, *Cultural Resources*, the project would involve the demolition of the Miramar Hangar (also referred to as Building 8), which is identified as a significant historical resource and direct impacts to historical resources (built environment) are identified as potentially significant. Although the project would implement mitigation measure HIST-1, which would involve preparation of Historic American Buildings Survey (HABS) Level II documentation, impacts to historic resources would remain significant and unavoidable. To avoid this impact, the District has identified the following project alternatives to avoid demolition of the Miramar Hangar through the reuse or movement of the Miramar Hangar. Each of these alternatives are discussed further below.

6.4.1.1 Miramar Hangar Reuse

The Miramar Hangar Reuse Alternative would involve the same construction of the southern parking area and paving of the engine testing pad but would utilize the Miramar Hangar in its existing state rather than demolishing it and constructing the Miramar College AIC building. This alternative would focus on adaptive reuse of the historic building by incorporating interior renovations, structural upgrades, and modernization of utilities and building systems while preserving the Miramar Hangar's character-defining features. By reusing the existing facility, this alternative would substantially reduce impacts to cultural resources by eliminating the project's significant and unavoidable impact on the built environment and removing the need for mitigation measure HIST-1. While the Miramar Hangar Reuse Alternative would support several project objectives, including Objective 4 to avoid program interruption and Objective 2 to maintain an instructional presence at MYF, it would not achieve the other project objectives. The existing Miramar Hangar's size, configuration, and structural limitations would constrain the ability to incorporate renovated and upgraded interior spaces to the extent envisioned in the proposed project under Objective 1. In addition, the facility upgrades involving accessibility, building standards, safety, and sustainability outlined in Objective 3 and 5 would not be achieved as the preservation of the hangar in accordance with Secretary of the Interior standards would not allow for such alterations. Therefore, this alternative is not feasible and was rejected from further analysis.

6.4.1.2 Miramar Hangar Relocation

As stipulated in California Code of Regulations (CCR) Title 14 Section 4852(d)(1) retention of a historical resource in its original location is encouraged. However, relocation may be acceptable to prevent demolition provided the resource retains its ability to convey its significance and thus eligibility for the CRHR. This may be achieved if 1) the move prevents demolition and 2) the new location is compatible with the original character and use of the historical resource. Under this alternative, the District would move the existing Miramar Hangar to a new site within MYF as a way to preserve the building's character-defining features and maintain its eligibility as a historical resource under CEQA. The District would then construct the proposed Miramar College AIC building and associated facilities in the same location as the proposed project once the Miramar Hangar was relocated. To preserve the original character and features that qualify it is a historic resource in accordance with CCR Title 14 Section 4852(d)(1), the Miramar Hangar would need to be relocated within the MYF property. However, no permanent site has been identified by the City on the MYF property where the Miramar Hangar could be relocated. Therefore, this alternative is not feasible and was rejected from further analysis.

6.4.2 Other Location Alternatives

In accordance with CEQA Guidelines Section 15126.6(f)(2), an alternative location for a project should be considered if the development of another site is feasible and if such development would avoid or substantially lessen the significant impacts of that project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the General Plan land use designation, and the availability of infrastructure. CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in addressing an off-site alternative is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Another one of the factors for the feasibility of an alternative site is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." To avoid potential impacts to historical resources that would occur through the demolition of the Miramar Hangar, the District considered multiple project alternatives involving implementation of the project on alternate project sites, which are each discussed below.

6.4.2.1 Other Location at Montgomery-Gibbs Executive Airport

Although a letter from the City's Economic Development Department dated April 30, 2026 indicated there were no other sites identified as suitable for long-term operation of the project, additional investigations by the City's Airports Division determined that it may be possible for the District to assist in developing an updated terminal facility that incorporated space for the District's instructional facilities. However, the space offered would provide no student parking opportunities and the twice-weekly engine testing that would occur with the project would not be accommodated in this location. Because Measure HH bond proceeds must be used for the authorized educational facilities purposes and projects presented to voters, Measure HH funds would typically pay only for the district's educational component, while the City would be required to fund the airport operational components. The complexity of a joint project at this location involving a new airport terminal would require extensive coordination, cost allocation agreements, and environmental analysis that may result in additional impacts beyond those identified for the project. The complexity and uncertainty of this alternative may also delay construction and operation of a new facility beyond the useful life of the existing facility. Therefore, this alternative was determined not feasible by the District and has been rejected from further detailed analysis.

6.4.2.2 Other Location Not on Airport Property

The Other Location Not on Airport Property alternative would avoid the significant and unavoidable impact to historical resources associated with demolition of the Miramar Hangar by eliminating the need to modify or remove the historic structure altogether. Under this alternative, the Aviation Operations Program would be relocated to a new instructional facility situated off airport property, and the existing hangar would remain in place without physical alteration. While the alternative would protect the historic building, it would not satisfy several core project objectives tied to aviation-specific instructional needs. Specifically, Aviation Operations Program staff determined that a location not on airport property would not achieve the instructional needs of the program because an off-airport site would lack the specialized facilities and contextual environment necessary for aviation coursework. Therefore, this alternative is not feasible and was rejected from further analysis.

6.4.2.3 Other Airport Property Location

To avoid potential impacts to historical resources caused by the demolition of the Miramar Hangar, the District additionally explored alternative locations on airport properties within San Diego County, including Brown Field Airport and Gillespie Field Airport. Under this alternative, the District would construct a new instructional building at another airport within the region, allowing the Miramar Hangar to remain in place without physical alteration. This alternative would maintain the Aviation Operations Program within an airport environment and would therefore support the project objectives involving the provision of hands-on aviation training within an airport setting and preparing students for aviation-related careers. However, the District determined that relocating the instructional space to a different airport could introduce substantial operational disruptions, including longer travel distances for students and faculty. Therefore, this alternative is not feasible and was rejected from further analysis.

6.5 Analysis of Project Alternatives

This section presents an evaluation of the two alternatives to the project carried forward for detailed analysis based on their ability to reduce project impacts (refer to Section 6.3) and meet most of the project objectives (refer to Section 6.2). For each of the alternatives, a brief description of the alternative is first presented, followed by a comparative impact analysis relative to the significant and unavoidable or significant but mitigated impacts of the project presented in Chapter 3.0, *Environmental Analysis*, of this EIR, and an assessment of the degree to which the alternative would meet the objectives of the project.

The No Project Alternative was selected for analysis pursuant to CEQA Guidelines Section 15126.6(e) as an alternative that represents reasonably foreseeable conditions if the project is not approved. In addition, the Reduced Ground Disturbance Alternative is considered as a means to reduce the significant but mitigated impacts to natural resources within the southern portion of the project area.

Table 6-1, *Comparison of Project and Alternatives Impacts*, provides a comparative summary of the project and alternatives with the purpose of highlighting whether each alternative would result in a similar, greater, or lesser impact than the project. Where the alternative would result in the same impact conclusion as the project, Table 6-1 indicates whether the alternative would reduce, increase, or keep consistent the degree of that impact.

Table 6-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS

Issue Areas with Potential for Significant Impacts under the Project	Project	Alternatives	
		No Project Alternative	Reduced Ground Disturbance Alternative
Biological Resources			
Special-Status Species	LTSM	NI	LTSM<
Cultural Resources			
Historic Resources	SU	NI	SU
Geology and Soils			
Paleontological Resources	LTSM	NI	LTSM<
Land Use and Planning			
Conflict with an Applicable Land Use Plan	SU	NI	SU
Noise			
Increase in Ambient Noise Levels	LTSM	NI	LTSM=
Ground-Borne Vibration	LTSM	NI	LTSM=
Airport Noise Exposure	LTSM	NI	LTSM=

SU = significant and unavoidable impacts; LTSM = less than significant impacts with mitigation; LTS = less than significant impacts; NI = No Impact
< represents comparatively reduced impact relative to the project (if impact designation is the same and impact varies)
> represents comparatively greater impact relative to the project (if impact designation is the same and impact varies)
= represents same/similar impacts relative to the project

6.5.1 No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The "no project" analysis is required to discuss the existing conditions at the time the NOP is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project Alternative, the District would not implement any of the project components, including the demolition of the Miramar Hangar, which would remain in its current condition with no demolition, relocation, or rehabilitation. Under this alternative, no physical changes would occur on the project site. As the No Project Alternative would not demolish the existing Miramar Hangar and therefore would not involve the necessary upgrades to Division of the State Architect (DSA) structural, access, and fire life safety standards, the Aviation Operations Program offered at Miramar College would cease operations, and the project site would be abandoned by the District. As such, this alternative is not considered feasible to implement per the DSA standards. However, in accordance with CEQA Guidelines Section 15126.6(e) the No Project Alternative is required to be evaluated.

6.5.1.1 Impact Analysis

Biological Resources (Special-Status Species)

Under the No Project Alternative, the proposed project would not be implemented and no demolition or construction activities would occur within the project area. As such, there would be no disturbance of

the disturbed habitat occupied by Belding's orange-throated whiptail and no potential impacts to San Diego fairy shrimp, western spadefoot, burrowing owl, or nesting birds would occur as a result of the No Project Alternative. Because the physical activities that were determined to result in impacts on special-status species would not occur, the potentially significant impacts identified for the proposed project would be avoided, and no mitigation measures would be required under this alternative. Therefore, impacts to special-status species under the No Project Alternative would be reduced compared to the proposed project and would result in no impact.

Cultural Resources (Historic Resources)

Under this alternative, the proposed project would not be implemented and the existing Miramar Hangar (Building 8), which has been determined eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and San Diego Register of Historical Resources (SDRHR), would remain in place. Because no demolition, relocation, or alteration of the historic structure would occur, the substantial adverse change to a historical resource identified for the proposed project would be avoided. As a result, the significant and unavoidable impact associated with the demolition of the Miramar Hangar would not occur, no mitigation measures would be required. Impacts to historic resources would be reduced to no impact under the No Project Alternative.

Geology and Soils (Paleontological Resources)

As the proposed project would not be implemented and no grading, excavation, or construction activities would occur on the project site under this alternative, the approximately 5,600 cubic yards of excavation that would occur under the proposed project within a geologic unit with moderate paleontological sensitivity (Quaternary Very Old Paralic Deposits, Unit 8), would not occur. Because no ground-disturbing activities would take place, there would be no potential to directly or indirectly destroy unique paleontological resources. Accordingly, the potentially significant impact identified for the proposed project would be avoided and mitigation measures GEO-1 through GEO-3 would not be required. Impacts to paleontological resources under the No Project Alternative would be reduced to no impact.

Land Use and Planning (Conflict with an Applicable Land Use Plan)

The proposed project would not be implemented, the existing Miramar Hangar would remain in place, and no redevelopment of the site would occur under this alternative. As a result, the project would not conflict with provisions of the Draft Airport Master Plan (AMP) that avoid alteration of the historic Miramar Hangar (Building 8), nor would it conflict with the intent of the City of San Diego Historical Resources Regulations to protect and preserve historic resources. Because the significant and unavoidable land use impact identified for the proposed project is directly tied to the demolition of the Miramar Hangar and the resulting inconsistency with these plans and policies, this impact would be avoided entirely under the No Project Alternative. Therefore, no land use plan inconsistency would occur, no mitigation measures would be required, and impacts would be reduced to no impact compared to the significant and unavoidable impact identified for the proposed project.

Noise (Increase in Ambient Noise Levels, Ground-Borne Vibration, Airport Noise Exposure)

Under the No Project Alternative, no demolition, grading, construction, engine testing pad improvements, or occupancy within the instructional facility would occur at the project site. As a result, the noise sources that would generate potentially significant impacts with implementation of the

project, including increased engine testing activities, temporary construction vibration, and occupancy of a new academic facility within the airport environment, would not occur. Consequently, there would be no potential for exceedances of applicable noise standards, no risk of construction-related vibration effects on nearby historic structures, and no new exposure of students or employees to airport-related noise levels. Mitigation measures NOI-1 through NOI-3 would not be required, and impacts related to ambient noise levels, ground-borne vibration, and airport noise exposure would be avoided entirely. Therefore, noise impacts under the No Project Alternative would be reduced to no impact.

6.5.1.2 Ability to Accomplish Project Objectives

The No Project Alternative would not meet any of the project objectives. This alternative would not provide expanded or upgraded instructional space for the Aviation Operations Program, would not support anticipated program growth, would not provide a modern facility that complies with current structural, safety, accessibility, and sustainability standards, and would not provide an enhanced educational environment for students and faculty. In addition, because the existing Miramar Hangar would not be upgraded to meet DSA requirements, the Aviation Operations Program would cease operations at MYF. As a result, the alternative would not support regional workforce development needs, would not maintain aviation instruction within an airport setting, and would not provide a means of avoiding instructional disruptions during construction. Therefore, while the No Project Alternative would eliminate project-related environmental impacts, it would fail to accomplish any of the project objectives.

6.5.2 Reduced Ground Disturbance Alternative

The Reduced Ground Disturbance Alternative would modify the proposed project to lessen the extent of construction activity in the southern portion of the project site, which would reduce potential impacts to biological resources and paleontological resources. Under this alternative, the District would redesign the project footprint to avoid or minimize grading, excavation, and paving within the southern parking area. By reducing ground disturbance, this alternative would decrease the likelihood of direct impacts to biological resources, including habitat used by special status species that were identified as having moderate potential to occur on the site. In addition, this alternative would reduce the potential to uncover or disturb previously unidentified paleontological resources. Although this alternative would continue to achieve the project objectives, reducing the southern parking area could constrain on-site circulation, parking capacity, and staging areas needed during construction.

6.5.2.1 Impact Analysis

Biological Resources (Special-Status Species)

The Reduced Ground Disturbance Alternative would lessen the extent of grading, excavation, and paving within the southern portion of the project site by reducing development associated with the southern parking area. Because special-status species habitat and the depressional features with potential to support San Diego fairy shrimp are located within or adjacent to the disturbed habitat areas of the project site, reducing ground disturbance would decrease the potential for direct impacts to special-status species and their habitat compared to the proposed project. However, construction of the Miramar College AIC building and associated improvements would still occur, and the alternative would continue to disturb portions of habitat with potential to support Belding's orange-throated whiptail, western spadefoot, burrowing owl, and nesting birds. Accordingly, potential impacts to special-status

species would remain less than significant with mitigation through implementation of mitigation measures BIO-1 through BIO-6, but the severity of those impacts would be somewhat reduced under this alternative compared to the proposed project. Therefore, impacts to special-status species under this alternative would be similar but less severe than those associated with the proposed project.

Cultural Resources (Historic Resources)

The Reduced Ground Disturbance Alternative would reduce grading, excavation, and paving activities within the southern portion of the project site; however, it would retain the core components of the proposed project, including demolition of the Miramar Hangar (Building 8) and construction of the new building. Because the historic resource would still be demolished, the alternative would result in the same substantial adverse change in the significance of a historical resource as the proposed project. Although mitigation measure HIST-1 requiring Historic American Buildings Survey (HABS) Level II documentation would continue to reduce impacts to the extent feasible, demolition of the Miramar Hangar would permanently remove the resource and impair its historical significance. Therefore, impacts to historic resources under the Reduced Ground Disturbance Alternative would remain significant and unavoidable and would be similar to those identified for the proposed project.

Geology and Soils (Paleontological Resources)

The Reduced Ground Disturbance Alternative would reduce the extent of grading, excavation, and paving activities within the southern portion of the project site by reducing development associated with the southern parking area. Because paleontological impacts are directly related to the amount of excavation occurring within the underlying Quaternary Very Old Paralic Deposits, Unit 8, reducing ground disturbance would reduce the likelihood of encountering and disturbing paleontological resources compared to the proposed project. However, construction of the Miramar College AIC building, engine testing area, and associated site improvements would still require excavation into geologic units with moderate paleontological sensitivity. Therefore, the alternative would continue to have the potential to impact paleontological resources and would require implementation of mitigation measures GEO-1 through GEO-3, including paleontological monitoring, treatment of fossil discoveries, and procedures for inadvertent finds. As with the proposed project, impacts would be reduced to a less than significant level with mitigation; however, the severity of potential impacts would be slightly reduced compared to the proposed project due to the decrease in ground disturbance.

Land Use and Planning (Conflict with an Applicable Land Use Plan)

The Reduced Ground Disturbance Alternative would retain the primary project components, including demolition of the Miramar Hangar (Building 8). Because this alternative would continue to remove the eligible historic resource, it would remain inconsistent with the provisions of the Draft AMP that anticipate preservation of the hangar and with the intent of the City of San Diego Historical Resources Regulations to protect and preserve historic resources. Although mitigation measures HIST-1 and NOI-2 would continue to reduce impacts to the extent feasible, the demolition of the eligible historic resource would continue to result in the same land use policy inconsistency identified for the proposed project. Therefore, impacts related to conflicts with applicable land use plans, policies, and regulations would remain significant and unavoidable and would be similar to those identified for the proposed project.

Noise (Increase in Ambient Noise Levels, Ground-Borne Vibration, Airport Noise Exposure)

While this alternative would involve less ground disturbance compared to the proposed project, this alternative would involve similar development in the portion of the site involving the Miramar College AIC building, engine testing area, and associated site improvements. As such, the potential noise impacts under this alternative involving an increase in ambient noise levels during engine testing activity, ground-borne vibration from the demolition of the Miramar Hangar and construction of the proposed Miramar College AIC building, and airport noise exposure during operation of the project would be similar to those identified for the proposed project. Therefore, this alternative would be required to implement mitigation measures NOI-1 through NOI-3 to reduce potential noise impacts to a level that is less than significant. Overall, impacts would be similar to those identified for the project.

6.5.2.2 Ability to Accomplish Project Objectives

The Reduced Ground Disturbance Alternative would achieve each of the identified project objectives. This alternative would continue to provide a new instructional facility with expanded and modernized instructional space to support anticipated enrollment growth (Objective 1), facilitate aviation education within an active airport environment (Objective 2), meet current building code, safety, and accessibility requirements (Objective 3), minimize disruption to the Aviation Operations Program (Objective 4), and incorporate sustainability features consistent with District and state goals (Objective 5). However, by reducing development of the southern parking area, the alternative could limit onsite circulation, parking capacity, and construction staging opportunities, which could somewhat reduce operational efficiency compared to the proposed project. Despite these constraints, the Reduced Ground Disturbance Alternative would continue to achieve the project objectives while providing some reduction in environmental impacts related to ground disturbance.

6.6 Environmentally Superior Alternative

An EIR is required to identify an environmentally superior alternative among the alternatives analyzed. The environmentally superior alternative is typically the alternative having the fewest significant environmental impacts or having the greatest ability to avoid or substantially reduce significant environmental impacts associated with the project. If the No Project Alternative is identified as the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) also requires that the EIR identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives (refer to Table 6-1), the No Project Alternative is identified as the Environmentally Superior Alternative. The No Project Alternative would eliminate the project's significant and unavoidable impact associated with historic resources and land use plan conflicts. The severity of the impacts that were determined to be less than significant with mitigation under this alternative would be eliminated compared to the impacts of the project. The No Project Alternative would result in no facility upgrades to meet current DSA requirements and the Aviation Operations Program at Miramar College would cease operations. As such, the No Project Alternative would not fulfill any of the project objectives.

Since the No Project Alternative is selected as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives in accordance with CEQA Guidelines Section 15126.6(e)(2). The remaining alternative is the Reduced Ground Disturbance Alternative. Under this alternative, significant and unavoidable impacts associated with historic

resources and land use plan and policy conflicts would remain. Impacts related to special-status species and paleontological resources that were determined to be less than significant with mitigation under this alternative would be similar but slightly reduced compared to the impacts of the project, while the impacts related to noise that were determined to be less than significant with mitigation would be similar. The Reduced Ground Disturbance Alternative would achieve each of the identified project objectives.

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This section identifies sources relied upon for the environmental analysis in this EIR. References are grouped by EIR section and correspond to the in-text references provided in those sections of the EIR.

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