

## Section 3.13

### Public Services

#### 3.13.1 Introduction

This section analyzes the proposed project's impacts on public services, including impacts from both construction and operational activities. As part of this analysis, the section describes the general approach and methodology, regulatory framework, environmental setting, and significance criteria used to evaluate the proposed project's public services effects. Public services, addressed herein, consist of fire protection/emergency medical services, law enforcement services (i.e., police protection and civil aviation security), and recreation/parks.

No comments specific to public services were received in response to the NOP.

#### 3.13.2 General Approach and Methodology

Relevant information on public services (e.g., response times, current staffing, equipment levels, and location of providers) was identified through review of maps, available studies and other documents, and communications with SDIA's Aviation Security and Public Safety Department. Because there are no set standards or formulas for estimating long-range staffing needs at SDIA, this analysis acknowledges that the City of San Diego Police Department (SDPD), San Diego Harbor Police Department (SDHPD), and City of San Diego Fire-Rescue Department (SDFD) would define its actual staffing needs more specifically through their ongoing assessments of service levels. The impacts analysis of public services resulting from implementation of the proposed project is based on whether conditions under the proposed project would meet key response time and capability criteria set forth by the City, SDFD, SDPD, SDHPD, and by state and federal regulations. Because, as described above, staffing needs are determined through ongoing evaluation and there are no uniform methods or standards for projecting long-range staffing needs at SDIA, this analysis does not include quantitative estimates of demand for additional fire and law enforcement personnel.

#### 3.13.3 Regulatory Framework

The following section presents the federal, state, regional, and local regulations, plans, and standards that are applicable to proposed project relative to public services.

##### 3.13.3.1 Federal

###### **Federal Laws and Regulations**

Federal laws and regulations applicable to fire protection, emergency services, and/or law enforcement at SDIA include the National Fire Protection Association (NFPA) Code, which provides the basis for fire protection and emergency services, and the Aviation and Transportation Security Act. Federal agencies that have law enforcement, fire protection, and/or emergency services jurisdiction over activities at SDIA also have their own applicable regulations. These agencies include the Federal Aviation Administration (FAA), U.S. Coast Guard, and Transportation Security Administration (TSA). Table 3.13-1 provides a list of federal regulations related to fire protection,

law enforcement, and emergency services most relevant to the proposed project, a summary of their provisions, and a list of responsible federal agencies.

**Table 3.13-1: Federal Regulations - Aviation Fire Protection, Law Enforcement, and Emergency Services**

Regulation	Summary of Provisions	Regulatory Agency
Federal Aviation Regulations (FAR) 139.315 through 139.319	Aircraft Rescue and Fire Fighting (ARFF)	FAA
FAR 139.321	Hazardous substances that require fire safety training	FAA
FAR 139.325 (f)	Requires Airport Emergency Plans to provide for Air/Sea Disaster Response	FAA/U.S. Coast Guard
FAR 139.325 (b) (5)	Airport response to natural disasters	FAA
National Fire Protection Association Code	Establishes fire safety provisions	N/A
Transportation Security Regulations	Civil aviation security	TSA
U.S Department of Labor, 29 CFR 1910.38	Emergency action plans	FAA

Source: San Diego Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. SCRRAA #EIR-06-01, State Clearinghouse No. 2005091105. Section 5.17, Public Services. April 2008.

### Federal Aviation Administration Regulations

The FAA is an agency of the U.S. government with primary responsibility for the safety of civil aviation. The FAA issues and enforces regulations and minimum standards covering the manufacture, operation, and maintenance of aircraft. The agency is responsible for the rating and certification of aircraft personnel and airport certification.

Federal Aviation Regulations (FARs) generally serve as the basis for SDIA's Airport Rules and Regulations Manual and Disaster Preparedness Plans. The fire and fire-related safety provisions found in these documents are also in accordance with applicable sections of the Uniform Fire Code (UFC) and/or the National Fire Protection Association Codes and Standards. FARs mandate many aspects of emergency response services at SDIA, including equipment types, personnel training, vehicle response times, and readiness. Compliance with FAR regarding fire safety is required under SDIA's operating permit.

#### *Aircraft Rescue and Fire Fighting (ARFF)*

ARFF is regulated under FAR Sections 139.315 through 139.319. Handling and storage of hazardous substances and materials, which require fire safety training in fuel farm and storage areas, and required compliance with locally adopted fire codes are provided for under FAR 139.321. Under FAR 139.325, airport safety plans require coordination with firefighting services and provision of rescue vehicles large enough to handle the maximum persons carried aboard the largest aircraft that can be served. Requirements for rescue and fire-fighting equipment and extinguishing agents are specified based on an index assigned to each airport. The index is determined by a combination of length of air carrier aircraft and average daily departures (i.e., the longest aircraft with an average of five or more daily departures determines the index required for an airport). SDIA is assigned an index of D (an average of five or more daily departures of aircraft

of at least 159 feet in length but less than 200 feet). The rescue and fire-fighting requirements for an Index D facility include one vehicle that carries extinguishing agents and two additional vehicles that carry a combined total quantity of 4,000 gallons of water for foam protection.<sup>1</sup> ARFF protocol also requires at least one airport rescue and firefighting vehicle to have the capability to reach the midpoint of the farthest runway serving air carrier aircraft from its assigned post, or reach any other specified point of comparable distance on the movement area available to air carriers, and begin application of extinguishing agents within three minutes from the time of the alarm. All other rescue vehicles are required to respond within four minutes from the time of alarm. Should equipment become inoperable for a period exceeding 48 hours, the FAA requires that equipment be replaced immediately with equipment having at least equal capabilities. If replacement equipment is not available immediately, airport operations should be limited to the response capability of equipment in operative condition unless waived by the FAA. The Airport Traffic Control Tower (ATCT) is responsible for activating the emergency telephone system, which notifies airlines when they are involved in safety-related operations.

#### *Air/Sea Disaster Response*

Due to its unique nature, an accident involving an aircraft over water requires a two-part command and control system. FAR 139.325(f) requires that airport emergency plans also provide a plan “for the rescue of aircraft accident victims from significant bodies of water or marsh lands adjacent to the airport...” The U.S. Coast Guard, Sector San Diego, is responsible for coordinating the search and rescue operations, including shore-side coordination and support with the assistance of representatives from the San Diego Harbor Police Department.

#### *Natural Disaster*

When a natural disaster occurs, the President of the United States can declare a State of Emergency in response to, and in agreement with, a request from the Governor of the affected state. Emergency action plans are addressed in general by 29 CFR 1910.38, Employee Emergency Plans, and 29 CFR 1910.39, Fire Prevention Plans.

FAR 139.325(4) regulates the requirement for preparation of airport response to a natural disaster. In the event of a natural disaster, the ATCT generally issues a Notice to Airmen (NOTAM)<sup>2</sup> if it is determined that this is necessary. In the event that the condition of the airport or any part of the airport is determined to be unsafe for landings or takeoffs, a NOTAM is issued closing the airport or any of its parts. The ATCT also verifies that the navigational aids system is operating.

<sup>1</sup> Current FAA regulations require the use of aqueous film forming foam (AFFF) containing per- and polyfluoroalkyl substances (PFAS) for emergency firefighting operations at SDIA; however, the required annual testing of foam equipment can be conducted without using foam. As discussed in Section 3.10, Hydrology and Water Quality, SDIA is required to develop a work plan for a preliminary investigation to determine if soil and/or groundwater is impacted by PFAS.

<sup>2</sup> NOTAM is a notice containing information concerning the establishment, condition, or change in any aeronautical facility, service, procedures, or hazard, the timely knowledge of which is essential to personnel concerned with flight operations.

## **The National Fire Protection Association Code**

The NFPA develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks. Individual communities adopt these codes into their own fire protection and emergency services operations on a voluntary basis; there are no legislative enforcement mechanisms in place.

## **Transportation Security Administration Regulations**

The TSA was created in response to the terrorist attacks of September 11, 2001 as part of the Aviation and Transportation Security Act signed into law in November 2001. The TSA issues and administers Transportation Security Regulations (TSRs), which are codified in 49 CFR, Parts 1500 through 1699. Many TSRs are former rules of the FAA that were transferred to TSA (Portions of 14 CFR parts 91, 107, 108, 109, 121, 129, 135, 139, and 191) when the TSA assumed the FAA's civil aviation security function in February 2002. These regulations contain rules that cover all segments of civil aviation security and require airport operators to adopt and carry out a security program approved by TSA. Among other items, the TSRs describe requirements for security programs, including establishing secured areas, air operations areas, security identification display areas, and access control systems.

### **3.13.3.2 State**

#### **State of California Uniform Fire Code**

State regulations include the UFC, which sets the framework for fire protection and safety within the State of California. The UFC contains several sections that provide authority and standards that pertain to operations at airport facilities.

#### *Fire Fighting Authority*

Article 2 provides standards for the organization, authority, duties, and procedures for firefighting. Division I, "Organization and Authority," Section 2.105 provides for the exercise of police powers by fire fighters. Division II, "Duties and Procedures," Section 2.201 provides for fire inspection and characterizes what can be declared an unsafe building.

#### *Fire Access*

Article 10, "Fire Protection Systems and Equipment," Division II, "General Provisions," Section 10.207 specifies access roadway requirements for fire apparatus. Article 12, "Maintenance of Means of Egress and Emergency Escapes," Section 12.109, provides standards for stair, ramp, and escalator enclosures.

#### *Air Service Operations*

Article 24, "Aviation Facilities" provides standards for airports, heliports, and helistops in Division I "General" Sections 12.013 "Dispensing Flammables or Combustible Liquids," 12.104 "Transferring Fuel," 24.105 "Application of Flammable or Combustible Liquid," and Sections 24.111-24.116, which provide aircraft service and repair standards. Provisions for safety standards of fuel system maintenance and use is provided in Article 24, Division II "Refueler Units," Section 24.202 "Operation Maintenance and Use of Aircraft Refueler," 24.203 "Fueling and Defueling," and Article 79 "Flammable and Combustible Liquids," Division I "General," Section

79.114 “Fire Protection,” Division II “Container and Portable Tank Storage Inside Buildings,” Section 79.205 “Fire Protection,” and Division VI “Tank Storage Underground, Outside or Under Buildings,” Section 79.511 “Fire Protection.”

### *Materials Handling*

Article 80 “Hazardous Materials,” Section 80.103 “General Requirements” and Section 80.110 “Designation of Cargo” provide for the identification and handling of hazardous materials sent as air cargo.

### **State Master Mutual Aid System**

The City of San Diego is partially dependent upon the strong state Master Mutual Aid system, which is managed by the Governor’s Office of Emergency Services (OES). California’s disaster planning is based on a statewide system of mutual aid. Each local jurisdiction relies first on its own resources and then calls for assistance as necessary: city to city; city to county; county to county; and county to the regional office of the OES, which relays unmet requests to the State. Mutual aid extended under this agreement and the operational plans adopted pursuant thereto, are available and furnished in all cases of “local emergency,” “state of emergency,” and “under state of war” as defined in the California Emergency Services Act (1970). Mutual Aid is utilized when an incident is likely to exceed, or has exceeded, the ability of a responsible entity to control it. Agencies receiving mutual aid are responsible for logistic support to all mutual aid personnel and equipment received.

### **California Coastal Act of 1976**

The California Coastal Act (“Coastal Act”)<sup>3</sup> was passed by the State legislature in 1976 and became effective January 1, 1977. The Coastal Act mandates the California Coastal Commission to “protect, conserve, restore, and enhance” the state’s coastal resources. Among the coastal resources specifically protected within the Coastal Act are: public access to the coastline, wetlands and other environmentally sensitive habitat areas, agriculture, low-cost visitor-serving recreational uses, visual resources, commercial and recreational fishing, and community character. As discussed in greater detail in Section 3.11, Land Use and Planning, Chapter 3 of the California Coastal Act identifies specific coastal planning and management policies that include the areas of public access and recreation.

### **3.13.3.3 Regional**

#### **San Diego County Regional Airport Authority Codes**

The San Diego County Regional Airport Authority Act (SDCRAA Act), as amended, establishes the fundamental powers and functions of SDCRAA. The SDCRAA Act empowers SDCRAA’s Board to adopt more specific rules to guide the conduct of the Board, officers and employees of SDCRAA, and those persons and entities that interact with SDCRAA or utilize the premises and property of SDCRAA. In exercising that power SDCRAA adopted a comprehensive set of Codes and Policies that include Article 7 “Safety and Security,” Part 7.2 “Emergency Measures.” Specifically, Part 7.20 states:

<sup>3</sup> Public Resources Code, Section 30000, et. seq.

- a) In the event of a disaster or emergency, the President/CEO or his or her designee may: (1) utilize city and county departments, law enforcement agencies, local medical resources and disaster preparedness groups for assistance; and (2) issue such directives and take such action as necessary to protect people, property and assets, and promote the safe operation of Authority Facilities.

The President/CEO, in the event of a disaster or emergency, may order all occupants to leave the facilities and airports under the jurisdiction of SDCRAA, or portions thereof, and prevent access to such areas for such time as may be necessary to assure the safety of the public and employees. During such an event, the President/CEO also may close or restrict the use of all airport roadways to vehicular traffic in the interest of public safety.

### 3.13.3.4 Local

#### City of San Diego General Plan

The Public Facilities, Services and Safety Element of the City's General Plan consists of citywide policies to address fire prevention policies and public safety. The General Plan Public Facilities, Services and Safety Element, Policy PF-D.1, specifies that fire stations should be located, staffed, and equipped to meet the response times based on population density as shown in Table 3.13-2 below.

**Table 3.13-2: Response Time based on Population Density**

Area	Population Density (population/square mile)	1 <sup>st</sup> Due Travel Time	Total Reflex Time	1 <sup>st</sup> Alarm Travel Time	1 <sup>st</sup> Alarm Total Reflex
Urban	>1,000	5	7.5	8	10.5
Rural	1,000 to 500	12	14.5	16	18.5
Remote	500 to 50	20	22.5	24	26.5
Open Space	N/A	10	12.5	15	17.5

Source: City of San Diego. General Plan, Public Facilities, Services and Safety Element. Updated June 2018. Available: <https://www.sandiego.gov/planning/genplan>.

Note: Reflex time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units.

The performance measures presented in Table 3.13-2 are used to plan for needed facilities. Where more than one square mile is not populated at similar densities, and/or a contiguous area with different density types aggregates into a population cluster area, the deployment measures shown below in Table 3.13-3 are to be used.

**Table 3.13-3: Response Time based on Aggregate Population**

Area	Aggregate Population	1 <sup>st</sup> Due Travel Time Goal
Metropolitan	>200,000	4
Urban-Suburban	<200,000	5
Rural	500 to 1,000	12
Remote	<500	>15

Source: City of San Diego. General Plan, Public Facilities, Services and Safety Element. Updated June 2018. Available: <https://www.sandiego.gov/planning/genplan>.

While the SDHPD has primary law enforcement jurisdiction, law enforcement services for SDIA are also provided by the Western Division of the SDPD. The General Plan Public Facilities Element, Policy PF-E.2, specifies SDPD response time goals for its five-level priority dispatch system: Priority E (Emergency), and Priorities 1 through 4. The SDPD's citywide response time goals are 7 minutes for Priority E calls (imminent threat to life), 12 minutes for Priority 1 calls (serious crimes in progress), 30 minutes for Priority 2 calls (less serious crimes with no threat to life), 90 minutes for Priority 3 calls (minor crimes/requests that are not urgent), and 90 minutes for Priority 4 calls (minor requests for police services).<sup>4</sup>

### San Diego Fire-Rescue Department

Development and protection of the SDIA area falls under the direction of the SDFD. The SDFD establishes policies that relate to fundamental issues of access for emergency personnel and fire protection. These include Fire Prevention Bureau (FPB) Policy E-09-2 (Emergency Evacuation Signage Requirements and Emergency Plan Information), which is intended to provide guidelines for emergency planning information requirements for buildings in accordance with California Code of Regulations (CCR), Title 19, Section 3.09, and FPB Policy A-14-1 (Fire Access Roadways), which clarifies SDFD's fire apparatus access roadway requirements as outlined in California Fire Code 503. Evaluation of the need for additional new or expanded fire stations occurs through a Standards of Response Coverage review conducted every five years or as needed, and community plan updates and amendments.<sup>5</sup>

### City Emergency Management Plans

SDFD staff maintains the City's Emergency Operations Center (EOC), Emergency Operations Plan (EOP) and Major Incident Response Plans (MIRPs). The EOP is the template for all activities within the EOC during activation and the MIRPs are incident-specific checklists for each department representative. In an emergency, disaster, or large scale-event, the EOC provides a platform for the City directorship to coordinate the executive-level concerns associated with response and recovery. At full activation, the EOC is staffed by several senior City managers and associated non-

<sup>4</sup> City of San Diego. General Plan, Public Facilities, Services and Safety Element. Updated June 2018. Available: <https://www.sandiego.gov/planning/genplan>.

<sup>5</sup> City of San Diego. General Plan, Public Facilities, Services and Safety Element. Updated June 2018. Available: <https://www.sandiego.gov/planning/genplan>.



city agencies and their support staff. At such times, the EOC serves as an information clearinghouse for the collection, collation and distribution of situational status reports.

### **City of San Diego Emergency Plan**

Pursuant to the authority conveyed by the California Emergency Services Act, the San Diego City Council enacted the Emergency Services Ordinance in 1974. The ordinance created the City of San Diego Disaster Council, which was charged with developing and recommending for City Council adoption an emergency plan for the City. The plan provides for the effective mobilization of all the resources of the City, both public and private, to meet any condition constituting a local emergency; and provides for the organization, powers and duties, services, and staff of the emergency organization.

### **San Diego Unified Port District**

The SDHPD has primary law enforcement duties for lands within the San Diego Unified Port District's (Port District) jurisdiction, including SDIA. As such, SDHPD is the first responder to incidents in the Airport, including aboard aircraft. The Port District's certified Port Master Plan (PMP)<sup>6</sup> describes Harbor Police Officers as patrolling assigned harbor or land areas within the Port District boundaries by boat, vehicle, and foot for: the preservation of order; enforcement of laws and ordinances; detection and prevention of crime; fire suppression and the protection of life and property; traffic control and law enforcement support for airport screening procedures; provision of information and assistance to the public; and such other duties as may be assigned. Response time goals for the SDHPD are considered sensitive security information (SSI) by the TSA and, therefore cannot be disclosed, although the response times are currently being met.<sup>7</sup>

The PMP<sup>8</sup> guides the physical development of the lands within the Port District's jurisdiction and also serves as the district's coastal program for purposes of the Coastal Act. The PMP lists land use objectives for its designated public recreation areas, including Spanish Landing Park and other parks located near SDIA. According to the PMP, all parks, plazas, public accessways, vista points, and recreational activities within the Port District's jurisdiction should:

- Provide a variety of public access and carefully selected active and passive recreational facilities suitable for all age groups including families with children throughout all seasons of the year.
- Enhance the marine, natural resources, and human recreational assets of San Diego Bay and its shoreline for all members of the public.
- Provide for clear and continuous multi-lingual information throughout District lands and facilities to and about public accessways and recreational areas.

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<sup>6</sup> Port of San Diego. Port Master Plan. August 2017 [print date].

<sup>7</sup> Welch, Clint. Director, Aviation Security and Public Safety, SDCRAA. Personal Communication. February 12, 2018.

<sup>8</sup> Port of San Diego. Port Master Plan. August 2017 [print date].



The PMP states that when thoughtfully planned, public and commercial recreational developments benefit from each other, although commercial activities within public recreation areas will be limited. Particular emphasis is placed on marine and water-oriented recreational activities, such as fishing, boating, beach use, walking and driving for pleasure, nature observation, picnicking, and more. Recreational land uses designated by the PMP include Recreation Area/Open Space, Park/Plaza, Promenade, Open Space, Public Fishing Pier, Golf Course, Open Bay, Boat Launching Ramp, Public Access, and Vista Areas.

### 3.13.4 Environmental Setting

This section describes existing public services and facilities, including fire protection/emergency medical providers, and law enforcement/police protection, and parks and recreation facilities that serve SDIA and surrounding communities.

Figure 3.13-1 shows the location of the public services providers, including fire stations, police stations, and parks, within the vicinity of SDIA.

#### 3.13.4.1 Fire Protection and Emergency Services

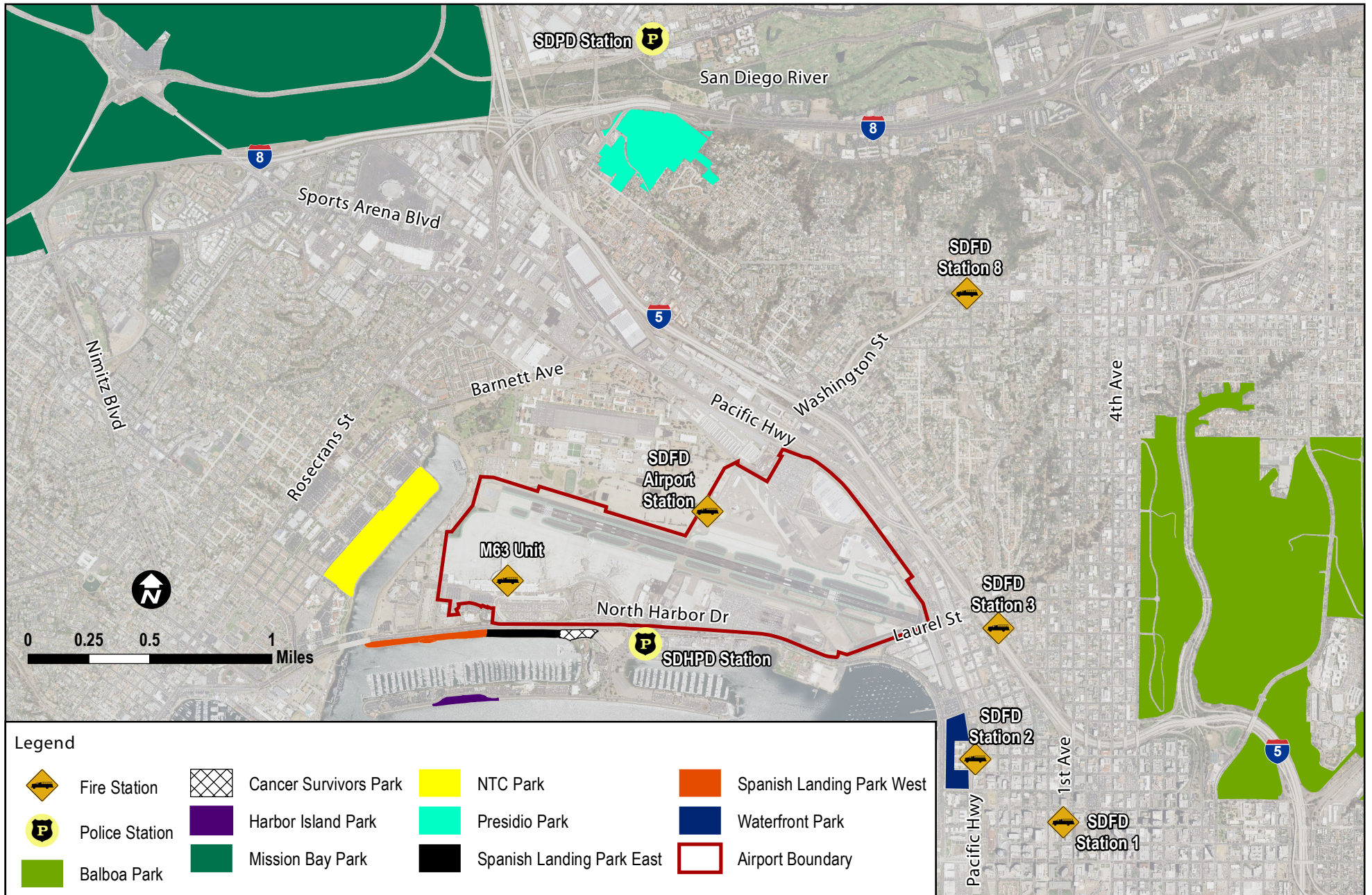
The SDFD provides fire protection services to the City of San Diego, including SDIA. Additionally, SDFD is part of the San Diego County Mutual Aid Agreement for fire departments, where fire departments within San Diego County provide assistance across jurisdictional boundaries when additional resources are needed, such as in the case of a large emergency or disaster. The City of San Diego is located within the Metro Zone, which also includes the fire departments in cities such as Chula Vista, Coronado, National City, Poway, and Imperial Beach.<sup>9</sup>

The ARFF facility, staffed and operated by SDFD, is located at Airport Station at 3698 Pacific Highway. This is the primary fire protection serving the airfield (i.e., runways, taxiways, and apron). While, as addressed below, there are multiple SDFD fire stations within and around SDIA capable of responding to landside incidents, the staff and equipment of the ARFF generally must remain on the airfield at all times, in preparation for an emergency airfield incident. The ARFF is only authorized to leave the airfield in response to a major (i.e., catastrophic) non-airfield aircraft incident.

The Airport Station is equipped with all-risk intervention units (i.e., engines, trucks, and/or rescue ambulances) to respond to various calls and alerts, as listed in Table 3.13-4. In 2017, the SDFD responded to ten Alert II and four Alert III calls at SDIA. In 2018, the SDFD responded to 16 Alert II calls. The lead and remaining rigs of the ARFF unit at the Airport Station responds to calls within an average time of three and four minutes, respectively.

<sup>9</sup> Lakeside Fire Protection District. San Diego County Mutual Aid Fire Zones. February 2018. Available: <http://lakesidefire.net/lakeside-fire-zones/>.





Source: SDCRAA, 2017.



**Table 3.13-4: Alert Types**

Crashes on the Airfield	
Alert I	Aircraft approaching with minor difficulty. (Airport units will respond - notify Battalion Chief [B1]).
Alert II	Aircraft approaching with major difficulty. Airport units R4 and B1 will respond, transmit 1 <sup>st</sup> alarm <sup>1</sup> only if requested by units on the field (R1, R2, R3) or B1.
Alert III	Aircraft crash on or near the Airport - immediate emergency action required (Airport units and 1 <sup>st</sup> alarm if on field, second alarm if in residential area).
Alert IV	Bomb threat aboard aircraft (one engine company, Metro Arson Strike Team [MAST] Captain, Explosives Device Team [EDT] Technician, and Battalion Chief initially respond). Bomb threat against an aircraft. Bomb threat against an Airport building. Hijack situation. Hijack is a term, which describes the unlawful seizure of an aircraft. The response to this situation is controlled by the FAA (in the air) or the Federal Bureau of Investigations (on the ground).
Crashes Off Airfield	
Alert V	Aircraft crash in a populated area. Automatic 2 <sup>nd</sup> Alarm, <sup>2</sup> with closest Crash Rig available, R4 and a paramedic unit.
Reduced Alert V	Aircraft crash where there is a limited hazard (on a freeway, city street, etc.), and there is no fire. Automatic 1 <sup>st</sup> Alarm with closest Crash Rig.
Wildland Alert V	Aircraft crash in a wildland, unpopulated area. Crash 2 Rig, R4, Water Tender, two Brush Rigs, Utility Rig (Note: No Trucks) and a paramedic unit.

Source: San Diego Regional Airport Authority. San Diego International Airport Master Plan Final Environmental Impact Report. SCRRRA #EIR-06-01, State Clearinghouse No. 2005091105. Section 5.17, Public Services. April 2008.

Notes:

1. 1<sup>st</sup> Alarm refers to a specified amount of equipment and staff needed to extinguish a normal size fire or incident. For example, a 1st Alarm response for a house fire is two Engines, one Truck and a Battalion Chief.
2. 2<sup>nd</sup> Alarm refers to a fire or incident of greater magnitude than a 1st Alarm. Another complement of 1st Alarm equipment is added to initial response.

For landside fire protection and emergency services, SDIA is within Battalion 1, which consists of six stations (Stations 1, 3, 4, 7, and 11, as well as Station 2 that opened in June 2018). The nearest SDFD station to SDIA that serves the landside areas (i.e., terminals and airport roadways) is Fire Station No. 3 located approximately one quarter mile away at 725 W. Kalmia Street. Other Battalion 1 fire stations within a one-mile radius of SDIA include the new Fire Station No. 2 located approximately 0.6 mile from SDIA at 875 West Cedar Street and Fire Station No. 1 at 1222 1<sup>st</sup> Avenue. Fire Station No. 8, in Battalion 2, is also located within one mile of SDIA at 3974 Goldfinch Street. The Battalion 1 stations located within one mile of SDIA are shown on Figure 3.13-1.

As described in Section 3.13.3.4, fire unit response time for SDFD stations is based on established standards related to population density (see Table 3.13-2 in Section 3.13.3.4). For urban areas (including near SDIA), this is 7 minutes and 30 seconds after dispatch receives the call, 90 percent of the time. A Fire-Rescue Standards of Response Report<sup>10</sup> prepared in 2017 for the City of San Diego to address Fire-Rescue standards of response determined that citywide, the first crew was

<sup>10</sup> Citygate Associates, LLC. San Diego Fire-Rescue Department Standards of Response Cover Review. Prepared for the City of San Diego. February 22, 2017.

on scene by an average 8 minutes 10 seconds 90 percent of the time in 2015/2016. Thus, on average citywide, the urban response time standard was not met. The exceedances of the performance standard were determined to be reflective of the large size of station areas, simultaneous calls for service, road network design, and traffic congestion.<sup>11</sup> Within Battalion 1, the average for all stations (not including Station 2 that opened in June 2018) was 7 minutes and 14 seconds 90 percent of the time. This is within the urban response time standard; however, some individual stations, including Station 3 and Station 11, did not meet the 7 minute 30 second performance standard as shown in Table 3.13-5, below.

**Table 3.13-5: Fire Dispatch to Arrival Time (90 Baseline Performance Real Year 2015/2016)**

Location	Time
<i>Performance Standard</i>	<b>7:30</b>
<b>Department-Wide</b>	<b>8:10</b>
Battalion 1	7:14
Station 1	6:53
Station 3	8:55
Station 4	6:56
Station 7	6:46
Station 11	7:47

Source: Citygate Associates, LLC. San Diego Fire-Rescue Department Standards of Response Cover Review. Prepared for the City of San Diego. February 22, 2017.

The Fire-Rescue Standards of Response Report identified that at the time of the report preparation, the City's Capital Improvement Program budget included six new fire stations (including Fire Station 2). New stations are one of the recommendations to improve response times presented in the Fire-Rescue Standards of Response Report. While Downtown San Diego was not identified as a priority area for needing a new station, the new Station 2 improves coverage in this area by adding a new station west of the railroad/light rail tracks, thereby reducing the potential for rail-related delays for service calls west of the railroad tracks and reducing the size of current Station 1 and Station 3 service areas. Additionally, Station 2 provides redundancy in the Battalion 1 service area, when units are committed to multiple incidents.<sup>12</sup> Therefore, coverage and response times are expected to improve in the Battalion 1 area.

<sup>11</sup> Citygate Associates, LLC. San Diego Fire-Rescue Department Standards of Response Cover Review. Prepared for the City of San Diego. February 22, 2017.

<sup>12</sup> Citygate Associates, LLC. San Diego Fire-Rescue Department Standards of Response Cover Review. Prepared for the City of San Diego. February 22, 2017.

M63 is an emergency paramedic unit<sup>13</sup> currently stationed inside the security gate at T2-West, which supports the Airport Station by providing emergency medical services; unlike the ARFF at the Airport Station, M63 can respond to both airfield and terminal/landside incidents. In addition, emergency medical services are provided through a public/private partnership between the City's Emergency Medical Services (EMS) and Rural Metro Corporation, which provides additional personnel and some ambulances. EMS has ambulances, paramedics, and emergency medical technicians (EMTs), who respond to emergency calls.

There are existing fire hydrants, fire flow, fire prevention, and warning systems located at SDIA to provide on-site fire protection. While newer structures, such as T2-West, have sprinkler systems, the existing T1 does not.

### 3.13.4.2 Law Enforcement

The SDHPD, with headquarters and administration located at 3380 North Harbor Drive ("SDHPD Station"), has primary law enforcement jurisdiction and is the first responder to incidents in the Airport (including aboard aircraft). In addition to the SDHPD Station, the SDHPD maintains a substation at SDIA within T1. The SDHPD Airport Division utilizes three specialized teams—foot patrol, the K-9 team, and vehicle patrol.

- Foot patrol officers are assigned to the terminals and respond to radio calls and any emergencies that may arise within the terminals, parking lots, and on-board aircraft. They patrol the terminals on foot on a random basis. Additionally, since September 11, 2001, officers are assigned to each security checkpoint and work closely with a variety of federal agencies, including the TSA, to provide additional security at SDIA.
- The K-9 team is assigned primarily at SDIA, but is also available to respond to all parts of San Diego County through a mutual aid agreement. Each officer and his K-9 partner undergo an extremely high success/find rate annual re-certification program, which must be passed to remain in the detection program. The K-9 team is the only TSA-certified explosive detection team south of Los Angeles International Airport.
- Vehicle units are assigned to patrol the runway and ramp areas as well as the parking lots and frontage roads of SDIA. They respond to radio calls and emergencies in and around SDIA and provide assistance to officers on foot in the terminals. During emergencies involving aircraft, they transport officers to pre-assigned positions, escort the responding fire department and emergency services vehicles to the aircraft once they are on the ground, and assist on scene. The vehicle units also perform random security checks in the secured areas of SDIA and assist with traffic, when there is a high volume of people traveling to and from SDIA.

Law enforcement services for SDIA are also provided by the Western Division of the SDPD, located at 5215 Gaines Street. The Western Division serves the neighborhoods of Hillcrest, La Playa, Linda Vista, Loma Portal, Midtown, Midway District, Mission Hills, Mission Valley West, Morena, Ocean

<sup>13</sup> A Paramedic Unit is a mini-emergency room on wheels equipped with among other things a gurney, bandages, medication, defibrillator and oxygen. The ambulance is equipped for advanced life support. Personnel are trained to handle any type of life threatening emergency in the field. The objective is to stabilize and transport victims to the closest appropriate facility.

Beach, Old Town, Point Loma Heights, Roseville-Fleetridge, Sunset Cliffs, University Heights, and Wooded Area. The Western Division serves a population of 129,709 people and encompasses 22.7 square miles.<sup>14</sup> The SDPD is equipped with an Air Support Unit for SDIA, which provides air support to patrol operations in assigned areas; surveillance of persons engaged in criminal activities; aerial security for V.I.P. and foreign dignitaries; and performs search and rescues involving downed aircraft and lost or stranded persons.

Response time goals for the SDHPD are considered SSI by the TSA and, therefore, cannot be disclosed. The Western Division of the SDPD operates under the citywide response time goals set for its five-level priority dispatch system: Priority E (Emergency), and Priorities 1 through 4. The SDPD's citywide response time goals are 7 minutes for Priority E calls (imminent threat to life), 12 minutes for Priority 1 calls (serious crimes in progress), 30 minutes for Priority 2 calls (less serious crimes with no threat to life), 90 minutes for Priority 3 calls (minor crimes/requests that are not urgent), and 90 minutes for Priority 4 calls (minor requests for police services).<sup>15</sup> The 2016 average response time for the Western Division was 6.1 minutes for Priority E (emergency) calls, 11.8 minutes for Priority 1 calls, 30 minutes for Priority 2 calls, 83.1 minutes for Priority 3 calls, and 156 minutes for Priority 4 calls.<sup>16</sup>

### 3.13.4.3 Parks

As shown on Figure 3.13-1, there are numerous parks in the immediate vicinity of SDIA, such as Spanish Landing Park at 4300 North Harbor Drive; Spanish Landing Park East at 3900 North Harbor Drive; Cancer Survivors Park within Spanish Land Park East; Harbor Island Park at 1875 Harbor Island Drive; NTC Park at 2455 Cushing Road; and Waterfront Park at 1600 Pacific Highway. Most of these parks provide open space, benches, and children's playgrounds.

Three regional parks are located close to SDIA—Balboa Park, Presidio Park, and Mission Bay Park. Balboa Park encompasses over 1,000 acres north of Downtown San Diego and includes 15 museums, performing arts venues, gardens, trails, a children's playground, and the San Diego Zoo. Presidio Park, located in the Old Town San Diego area, encompasses over 50 acres and includes Junípero Serra Museum, picnic areas, small venue space, restrooms, monuments, and open lawn space for active and passive recreation. Mission Bay Park is located north of the SDIA and houses many boat launches, bayside boardwalks, children's playgrounds, designated swimming areas, areas for water sports, and basketball and volleyball courts. Mission Bay Park consists of over 4,200 acres and has 27 miles of shoreline.

<sup>14</sup> City of San Diego. Police Department, Western Division website. 2018. Available: <https://www.sandiego.gov/police/services/divisions/western>.

<sup>15</sup> City of San Diego. General Plan, Public Facilities, Services and Safety Element. Updated June 2018. Available: <https://www.sandiego.gov/planning/genplan>.

<sup>16</sup> City of San Diego. Midway-Pacific Highway Community Plan Update Draft Program Environmental Impact Report. Page 2-31. SCH# 2015111013. December 2017. Available: [https://www.sandiego.gov/sites/default/files/midway-pacific\\_hwy\\_cpu\\_peir\\_draft\\_dec2017.pdf](https://www.sandiego.gov/sites/default/files/midway-pacific_hwy_cpu_peir_draft_dec2017.pdf).

### 3.13.5 Thresholds of Significance

The following criterion for public services is derived from Appendix G of the CEQA Guidelines. Under this criterion, a proposed project would result in significant impacts associated with public services if it would:

**Impact 3.13-1** Have a substantial adverse physical impact 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 following public services:

- Fire protection
- Police protection
- Parks

The significance threshold criteria for public services impacts that are identified in Appendix G of the State CEQA Guidelines include “schools” and “other public facilities.” The proposed project is located at an existing international airport located within the City of San Diego and would not affect the region’s population through displacement or construction of housing or, as discussed in Section 6.4 of Chapter 6, have other growth inducing impacts that could affect service ratios, response times, or other performance objectives for schools and other public services such as libraries or hospitals.

### 3.13.6 Project Impacts

#### 3.13.6.1 Impact 3.13-1

**Summary Conclusion for Impact 3.13-1: Construction and operation of the proposed project would not have a substantial adverse physical impact 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. As such, and as further described below, implementation of the proposed project would result in a *less than significant impact* for construction and operation of the project.**

##### 3.13.6.1.1 Construction

###### *Fire Protection*

During construction of the proposed project, the existing fire stations would continue to provide paramedic and fire protection services on the airfield and at the Airport. The ARFF is located on the north side of the Airport at the SDFD Airport Station on Pacific Highway, and is not near the proposed project construction areas. Therefore, construction activities would not affect access in and out of the Airport Station, or otherwise affect station operations and response times. Similarly, construction would not affect the operations of the emergency paramedic unit (M63) located within T2-West. It is not anticipated that the T2-West modification would disrupt operations of M63 during construction; however, should this occur, the medical unit would be temporarily



relocated elsewhere within T2, with no anticipated interruption of service and no need for new facilities.

Construction activities would result in temporary access restrictions to areas under construction; however, access routes through the construction area would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Fire Code regulations. Further, throughout the construction period, public access to the Airport terminals and public parking outside of the construction activities would be maintained, which would also ensure that adequate access for emergency vehicles would be available.<sup>17</sup>

Construction activities would occur within the boundaries of SDIA, with the exception of utility connections within the public right-of-way and the connection to the new on-airport entry roadway at Laurel Street. Such improvements may require temporary lane closures. The temporary lane closures would occur in coordination with the City of San Diego, SDFD, SDPD, and SDHPD. Potential roadway level of service deficiencies at key intersections and roadway links within the project site and immediate vicinity would be minimized through implementation of a construction traffic management plan. This would ensure proper advanced coordination with emergency service providers and planning of detours and emergency access routes if needed to maintain emergency access and response times. Therefore, with compliance with site access requirements and implementation of appropriate construction traffic management procedures, adequate fire protection service levels would be maintained. No new firefighting facilities would be required and there would be no need for additional paramedic or fire protection units or equipment during construction. Therefore, impacts to fire protection services during construction would be *less than significant*.

#### *Law Enforcement*

During construction of the proposed project, SDHPD and SDPD would continue to provide law enforcement services at SDIA. For example, the SDHPD's foot patrol of the terminals, the K-9 team, and vehicle patrol activities would continue to occur. The SDHPD sub-station currently located within the existing T1 would be moved to T2-East. The relocation of the sub-station would occur in advance of the demolition of T1 (Phase 1b) and would not change law enforcement operations or otherwise interrupt law enforcement activities or capabilities at SDIA.

It is anticipated that sufficient space would be available for SDHPD in the existing T2-East (the facility would occupy the space formerly occupied by Customs and Border Patrol, which has relocated to the Airport's Federal Inspection Services [FIS facility] that opened in June 2018). Therefore, adequate on-site law enforcement response capabilities would be maintained during construction activities.

The new T1 would include space to provide an additional satellite station for SDHPD, although no large increases in staff needs are anticipated to be needed to provide adequate law enforcement services.<sup>18</sup> Space would also be provided within the new T1 for security personnel working in the terminal, including administrative and break areas. Depending on the number of exit lanes from the sterile concourse at T1, increases in SDCRAA-contracted security personnel may be required.

<sup>17</sup> FAA FAR Sections 139.315–139.319—Aircraft Rescue and Firefighting (ARFF) and State of California Uniform Fire Code.

<sup>18</sup> Welch, Clint. Director, Aviation Security and Public Safety, SDCRAA. Personal Communication. February 12, 2018.

The provision of space within the new T1 for both a SDHPD satellite facility and contract security personnel is assumed as a part of the overall T1 construction and would not cause significant environmental effects beyond those already addressed as part of the proposed project.

The SDHPD Station is located on North Harbor Drive opposite SDIA, across from the site of the new T1. Construction would occur within SDIA boundaries with the exception of utility connections and the connection to the new on-airport entry roadway at Laurel Street. As discussed above, such improvements may require temporary lane closures. The temporary lane closures would occur in coordination with the City of San Diego, SDFD, SDPD, and SDHPD. Potential roadway level of service deficiencies at key intersections and roadway links within the project site and immediate vicinity would be minimized through implementation of a construction traffic management plan. This would ensure proper advanced coordination with law enforcement service provided and planning of detours and emergency access routes if needed to maintain emergency access and response times. Therefore, no delay in access to and from SDHPD Station is anticipated and adequate law enforcement service levels would be maintained.

Construction activities would result in temporary access restrictions within the areas under construction; however, as discussed above, access routes through the construction area and in and out of SDIA would be kept clear and unobstructed at all times in accordance with FAA, Fire Marshal, and Fire Code regulations, thereby ensuring that adequate ingress and egress for law enforcement vehicles would be maintained.

As described above, adequate law enforcement facilities and access would be maintained during construction, and no reduction in services or response time would occur. Therefore, there would be no need for additional police protection units or equipment during construction. Further, while additional space would be provided within the new T1 for law enforcement purposes, construction of T1 is addressed throughout this EIR, and there would not be substantial adverse physical impact associated with the provision of new or physically altered governmental facilities beyond those already addressed as part of the proposed project. Therefore, impacts to law enforcement services during construction would be *less than significant*.

### *Parks*

Construction of the proposed project would occur within SDIA property and would not physically encroach into existing or planned parkland areas near SDIA. Likewise, construction activities would not obstruct the public's ability to access parks via the surrounding street system, including bicycle lanes and sidewalks, that provides access to the parks in the vicinity. The closest park, Spanish Landing, is approximately 100 feet from SDIA. This park is in an urban environment with existing sources of noise that include traffic on North Harbor Drive, current SDIA operations, and other surrounding development. While construction activities occurring at SDIA would contribute to the existing noise levels at the park, as discussed in Section 3.12, Noise, this temporary noise source would not result in a substantial increase in ambient noise levels that would adversely impact the park's recreational value, uses, and functions. Other parks are located a greater distance from SDIA and would not be affected by construction noise. Similarly, as described in Section 3.1, Aesthetics and Visual Resources, scenic views from Spanish Landing Park are towards the San Diego Bay and downtown San Diego. Construction activities would not adversely affect viewers at Spanish Landing Park or other parks in the vicinity, such as Harbor Island or other areas where

scenic views contribute substantially to the recreational experience. Therefore, impacts to parks related to construction of the proposed project would be *less than significant*.

### 3.13.6.1.2 Operations

#### *Fire Protection*

The implementation of the proposed project would enable the Airport to accommodate future growth that is anticipated to occur at SDIA.

While additional aircraft movements and passenger activity would potentially increase the potential for fires and airfield incidents, standard procedures for plan review during the construction phase would ensure that the new construction and roadway improvements are in conformance with the current California Uniform Fire Code, the SDFD bulletins that supplement the California Uniform Fire Code, FAA Codes, and other applicable standards. In compliance with such requirements, the new components of the proposed project would have adequate fire hydrants, fire flow, fire prevention and warning systems, and fire equipment access to all new structures and areas at SDIA. Currently, the existing T1 does not have a terminal-wide fire sprinkler system. Compliance with the current Uniform Fire Code, including installation of a fire sprinkler system, would enhance fire suppression capabilities at T1.

As previously described, SDIA landside is within the service area of SDFD Station 3. On average, Station 3 did not meet the urban response time standards in 2015/2016; however, with new Station 2 in operation south of SDIA, the size of the service area for Station 3 will be reduced. This is anticipated to improve response times in the vicinity of SDIA. Further, the proximity of multiple stations to SDIA, in addition to Station 3 (i.e., Stations 1, 2, and 8), would allow the SDFD to provide support and respond to landside calls at SDIA within a similar or improved response time to current conditions.

As previously described in Section 3.13.3.1, the operational requirements for ARFF at the Airport Station are related to the index assigned to each airport based on the largest air carrier aircraft with five or more daily departures, and the response time for at least one airport rescue and firefighting vehicle to reach the midpoint of the farthest runway within three minutes from the time of the alarm. Further, under the proposed project, the types of aircraft, as defined by Airplane Design Group (ADG), departing/landing at the Airport are anticipated to be similar to existing conditions. Also, implementation of the proposed project would not affect the distance to, and access route for, emergency response vehicles at the ARFF to reach the midpoint of the farthest runway (for SDIA, a single runway airport, this would be Runway 9-27). Therefore, it is anticipated that with implementation of the proposed project, SDIA would retain an ARFF Index D determination and, thus, the existing equipment and agents at the ARFF would be adequate to meet aircraft rescue and firefighting needs and requirements regulations. However, as described in Section 2.5.1 in Chapter 2, Project Description, the 2018 aviation activity forecast assumes that the average aircraft gauge (size) would increase through 2050 (see Table 2-1 in Chapter 2, Project Description.) If the increased aircraft gauge results in an average of five or more daily departures of aircraft of at 200 feet, SDIA's Index determination would change to Index E, which also requires three fire fighting vehicles. Should the index determination change, SDIA would be subject to the FAR requirements associated with the updated Index determination and would be required by FAA to comply.

The ARFF is located to the north of the runway. The operation of the ARFF would not be affected by the proposed project as the proposed facilities are located south of the runway. Therefore, the existing average response times of three minutes for the lead rig and four minutes for the remaining rigs would be maintained. Under the proposed project, no additional ARFF staffing or equipment needs are anticipated.<sup>19</sup>

Emergency paramedic unit (M63) would continue to operate at SDIA and, given the on-site location, would continue to be available to respond to calls and emergencies as they do today. The need for paramedic services at SDIA is based on the volume of passengers through the Airport and the average number of incidents per passenger. The SDFD would continue to conduct ongoing reviews of staffing and equipment levels pursuant to standard SDFD procedures to ensure maintenance of emergency paramedic services. Additionally, paramedic/firefighters stationed at each of the City's fire station are available to provide additional emergency paramedic support as needed.

As described herein, the Airport Station and other local fire stations would continue to provide fire protection services on the airfield and at the Airport, and maintain adequate response times and service levels. Further, enforcement of code requirements pertaining to emergency vehicle access, as well as building standards, would also ensure maintenance of adequate response times and emergency access. Therefore, no new firefighting facilities would be required and there would be no need for existing fire stations to be relocated or expanded. Furthermore, the SDFD would continue to conduct ongoing reviews of staffing and equipment levels pursuant to standard SDFD procedures and FAR requirements to ensure maintenance of adequate response times, staffing, equipment, facilities, and emergency access. Therefore, impacts to fire protection related to operation of the proposed project would be *less than significant*.

#### *Law Enforcement*

The implementation of the proposed project would enable the Airport to accommodate future growth that is anticipated to occur at SDIA. Due to the level of security provided at SDIA for civil aviation protection reasons, incidents of theft, destruction or damage at SDIA facilities, and to employee vehicles and property are not expected to increase as a result of the proposed project. The SDHPD and SDPD would continue to provide law enforcement services at SDIA. SDHPD would remain stationed at the Airport at a new location in T2-East, with space for a satellite station within the new T1. Therefore, on-site SDHPD activities, including foot patrols and vehicle patrols, would be maintained and no reduction in service levels or response to times would occur. Further, the new T1 and terminal modifications would provide adequate space for security and screening facilities that meet current FAA and TSA requirements. As such, the operation of the proposed project would not result in the need for new or expanded law enforcement facilities.

Furthermore, the SDHPD and SDPD would continue to conduct ongoing reviews of staffing and equipment levels to ensure that adequate law enforcement is provided at SDIA. Therefore, acceptable service ratios and response times would be maintained. While additional space would be provided within the new T1 for law enforcement purposes, construction and operation of T1 is addressed throughout this EIR, and there would not be substantial adverse physical impact associated with the provision of new or physically altered governmental facilities beyond those

<sup>19</sup> Robbins, Dean. Airside Operations, SDCRAA. Personal Communication. February 9, 2018.

already addressed as part of the proposed project. As such, impacts to law enforcement services and facilities associated with the operation of the proposed project would be *less than significant*.

### *Parks*

Operation of the proposed project would occur within SDIA boundaries and would not have any direct impact on parks, or park access. Further, the implementation of the proposed project would not involve the construction of new housing or otherwise induce new growth within the region that would create an increased demand for acquisition and development of new public parks. The parks in the vicinity of SDIA, including Spanish Landing Park and NTC Park, are located in an urban environment with existing ambient noise levels influenced by commercial aircraft operations throughout the day, nearby roadways (i.e., North Harbor Drive), and businesses already operating in that existing noise environment. It is not anticipated that operation of the proposed project would substantially interfere with normal park use. As described in Section 3.1, Aesthetics and Visual Resources, the use and layout of new components of the proposed project would not lessen the parks' recreational value and aesthetic qualities. Therefore, impacts to parks associated with the operation of the proposed project would be *less than significant*.

### **Summary**

As discussed above, construction and operation of the proposed project would not result in the 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 public services (fire protection, law enforcement, and parks.) Therefore, the construction and operation of the project would have a *less than significant impact* relative to public services.

#### **3.13.6.1.3 Mitigation Measures**

No mitigation is required for construction or operations.

#### **3.13.6.1.4 Significance of Impact After Mitigation**

As indicated above, no mitigation is required relative to this impact. The project would result in a *less than significant impact* for construction and operations.

### **3.13.7 Summary of Impact Determinations**

Table 3.13-6 summarizes the impact determinations of the proposed project related to public services, as described above in the detailed discussion in Section 3.13.6. Identified potential impacts are based on the significance criteria presented in Section 3.13.5, the information and data sources cited throughout Section 3.13, and the professional judgment of the report preparers, as applicable.

**Table 3.13-6: Summary Matrix of Potential Impacts and Mitigation Measures Associated with the Proposed Project Related to Public Services**

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
<p><b>Impact 3.13-1: Construction and operation of the proposed project would not have a substantial adverse physical impact 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. As such, implementation of the proposed project would result in a <i>less than significant impact</i> for construction and operation of the project.</b></p>	<p>Construction: Less than Significant</p> <p>Operation: Less than Significant</p>	<p>No mitigation is required</p>	<p>Construction: Less than Significant</p> <p>Operation: Less than Significant</p>

### 3.13.7.1 Mitigation Measures

No mitigation is required for construction or operations.

### 3.13.8 Significant Unavoidable Impacts

There would be no significant and unavoidable impacts to public services associated with construction and operation of the proposed project.

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