

Chapter 6

Other CEQA Considerations

6.1 Introduction

Pursuant to Sections 15130 and 15126.2 of the State CEQA Guidelines, this chapter identifies significant environmental effects which cannot be avoided if the proposed project is implemented, and describes significant irreversible environmental changes and growth-inducing impacts.

6.2 Significant Unavoidable Impacts

Based on the detailed analysis provided in Sections 3.1 through 3.15 and Chapter 4, Cumulative Impacts Analysis, the proposed project would result in the following significant and unavoidable impacts during construction and/or operation of the project:

- **Air Quality**

- **Operations** – Implementation of the proposed project would exceed the screening-level emissions thresholds for certain criteria pollutants, which would be a significant and unavoidable impact. With the exception of PM₁₀, concentrations of criteria pollutants would not exceed state or federal standards and, therefore, would result in a less than significant impact, relative to those pollutants. However, existing background concentrations of PM₁₀ currently exceed state standards and the increase in PM₁₀ concentrations associated with project operations would increase that existing exceedance. As such, the project's concentration-based impact associated with PM₁₀ would be a ***significant and unavoidable impact***, even after implementation of feasible mitigation measures. It should be noted for informational purposes that air pollutant emissions associated with future operations at SDIA would be even greater (higher) without implementation of the proposed project (i.e., under the No Project Alternative) due to the fact that future growth in aircraft operations and passenger levels at SDIA would be the same with or without the proposed project; however, implementation of the proposed project would include improvements in aircraft taxiing operations and motor vehicle movements near SDIA that would reduce air pollutant emissions.
- **Cumulative Impacts – Construction and Operations** - Construction of the proposed project in conjunction with other projects anticipated to be under construction during that same period would result in a ***significant*** impact relative to cumulative emissions, to which the proposed project's contribution to that significant impact would be ***cumulatively considerable***. Operation of the proposed project at buildout in 2035 and in 2050 would result in a cumulatively considerable net increase of VOCs and NO_x, which are precursors to ozone (O₃), for which the San Diego air basin is in nonattainment under federal and state ambient air quality standards. Even with implementation of Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 and MM-TDM-1, the proposed project's contribution to the cumulatively considerable net increase in VOCs and NO_x would be ***significant and unavoidable***. Existing background concentrations of PM₁₀

currently exceed state standards and there would be an increase in PM₁₀ emissions associated with project operations, which is considered to be cumulatively considerable; this is a ***significant and unavoidable impact***. Similar to above, the severity of these impacts would be greater (higher) if the proposed project was not implemented.

- **Greenhouse Gas (GHG) Emissions**

- **Construction and Operations:**

- Construction and operation of the proposed project would generate GHG emissions that may have a significant impact on the environment. Even with implementation of proposed Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 and MM-TDM-1, impacts would be ***significant and unavoidable***. Similar to above relative to air quality impacts, and for the same reasons described therein, GHG emissions from future operations at SDIA would be even greater (higher) without implementation of the proposed project.
 - Construction and operation of the proposed project would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Even with implementation of proposed Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 and MM-TDM-1, impacts would be ***significant and unavoidable***. Similar to above, the severity of this impact would be greater (higher) if the proposed project was not implemented.

- **Cumulative Impacts – Construction and Operations:**

- Cumulatively considerable increase in GHG emissions. Even with implementation of proposed Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 and MM-TDM-1, project contribution would be ***significant and unavoidable***. Similar to above, the severity of this impact would be greater (higher) if the proposed project was not implemented.
 - Cumulatively considerable impact relative to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Even with implementation of proposed Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 and MM-TDM-1, project contribution would be ***significant and unavoidable***. Similar to above, the severity of this impact would be greater (higher) if the proposed project was not implemented.

- **Cultural Resources**

- **Construction** – Implementation of the proposed project would require the demolition and removal of two significant historical buildings (the existing Terminal 1 and the existing Terminal 2-East). Mitigation Measure MM-HR-1: Preparation of Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Documentation, is proposed to document the characteristics of each of these two buildings; however, even with implementation of MM-HR-1, the permanent loss of these

two historic structures would be a ***significant and unavoidable impact*** of the proposed project.¹

- **Cumulative Impacts – Construction** – Even with implementation of Mitigation Measure MM-HR-1, the project’s cumulatively considerable contribution to significant impacts to historical resources would be ***significant and unavoidable***.
- **Hazards and Hazardous Materials**
 - **Operations**
 - The proposed project would be located within an airport land use plan and, although it would not result in a safety hazard, it could result in excessive aircraft noise for people residing or working in the project area; even with implementation of aircraft noise-related Mitigation Measures MM-NOI-1 through MM-NOI-5. this would be a ***significant and unavoidable impact***. This significant impact could be considered to be a cumulatively considerable contribution to significant noise impacts within the region.
- **Land Use and Planning**
 - **Operations** – Significant impacts associated with future aircraft noise levels and future traffic could be considered to conflict with the Community Plans for the affected areas. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible. As such, operation of the proposed project would result in a ***significant and unavoidable impact***. As further described below relative to noise and traffic impacts, it should be noted for informational purposes that those impacts associated with future operations at SDIA would be generally the same with or without the proposed project due to future growth in aircraft and passenger activity levels that would occur regardless of the proposed project.
 - **Cumulative Impacts – Operations** – The project’s significant noise and traffic impacts are considered to be a cumulatively considerable contribution to increased noise levels and traffic congestion within the affected Community Plan areas, which would be ***significant and unavoidable***. For the same reason noted above, this impact would be the same with or without implementation of the proposed project.
- **Noise**
 - **Operations:**
 - Airport operations at SDIA in future years (2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that would increase noise levels at exterior use areas

¹ As further discussed in Section 3.6, Cultural Resources, of this Recirculated Draft EIR, implementation of the proposed project would also impact the former United Airlines Hangar and Terminal Building, which is also a significant historical building. Mitigation Measures MM-HR-1: Preparation of Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Documentation and MM-HR-2: Relocation of the United Airlines Hangar and Terminal Building, are proposed and would reduce the impact to a level less than significant.

of residences and other noise-sensitive uses to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition. Even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, it is uncertain whether all of the affected uses would be soundproofed. As such, this would be a **significant and unavoidable impact**. It should be noted for informational purposes, however, that the future increases in aircraft noise levels that result in this impact would be the same even if the proposed project was not implemented (i.e., there is no difference between the proposed project and the No Project Alternative relative to future increases in aircraft noise levels).

- Implementation of the proposed project would cause a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater increase in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. Even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, it is uncertain whether all of the affected areas would be soundproofed. As such, this would be a **significant and unavoidable impact**. It should be noted for informational purposes, however, that the future increases in aircraft noise levels that result in this impact would be the same even if the proposed project was not implemented (i.e., there is no difference between the proposed project and the No Project Alternative relative to future increases in aircraft noise levels).
- Implementation of the proposed project would cause a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. Even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, it is uncertain whether all of the affected areas would be soundproofed. As such, this would be a **significant and unavoidable impact**. It should be noted for informational purposes, however, that the future increases in aircraft noise levels that result in this impact would be the same even if the proposed project was not implemented (i.e., there is no difference between the proposed project and the No Project Alternative relative to future increases in aircraft noise levels).
- Implementation of the proposed project would cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. Even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, it is uncertain whether all of the affected areas would be soundproofed. As such, this would be a **significant and unavoidable impact**. It should be noted for informational purposes that the future increases in nighttime flights associated with flight operations at SDIA would be the same with or without the proposed project due to future growth in aircraft activity levels that would occur regardless of the proposed project.

- Implementation of the proposed project would cause traffic noise levels for existing development along two segments of one roadway to exceed the noise levels considered compatible for noise-sensitive areas associated with the applicable land use categories. Also, implementation of the proposed project would cause traffic noise levels along one segment that is currently at or already exceeds the levels considered compatible for noise-sensitive land use associated with the applicable land use categories to increase by 3 dB CNEL, or more, as compared to existing baseline conditions. There are no feasible mitigation measures available for these impacts. As such, these would be **significant and unavoidable impacts**. Similar to above, it should be noted for informational purposes that the future increases in roadway noise levels that result in this impact would be generally the same even if the proposed project was not implemented (i.e., there is no material difference between the proposed project and the No Project Alternative relative to future increases in roadway noise levels, with the exception of a segment of North Harbor Drive where future roadway noise levels would be lower with implementation of the proposed project, compared to without the proposed project).
- **Cumulative Impacts – Operations** – The combination of future aircraft noise levels and future traffic noise levels would result in significant cumulative noise impacts. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible. As such, the cumulative impact would be **significant and unavoidable**. As noted above, future aircraft noise levels and impacts to noise-sensitive areas associated with operations at SDIA would be the same with or without the proposed project.
- **Traffic and Circulation**
 - **Construction**
 - Implementation of the proposed project would exceed thresholds of significance relating to the operation of 5 intersections in 2024 With Project Construction Conditions scenario (Construction Phase 1b). Although mitigation is proposed to reduce these impacts, impacts would not be fully mitigated and would be **significant and unavoidable** at 1 intersection.
 - Implementation of the proposed project would exceed thresholds of significance relating to the operation of 4 intersections in 2026 With Project Construction Conditions scenario (Construction Phase 2a). Although mitigation is proposed to reduce these impacts, impacts would not be fully mitigated and would be **significant and unavoidable** at 1 intersection.
 - Implementation of the proposed project would exceed thresholds of significance relating to the operation of 10 intersections in 2030 With Project Construction Conditions scenario (Construction Phase 2b). Although mitigation is proposed to reduce these impacts, impacts would not be fully mitigated and would remain **significant and unavoidable** at 4 intersections.

– Operations

- Implementation of the proposed project would result in unacceptable operations of study facilities. Of those facilities, 5 intersections, 11 roadway segments, and 14 freeway segments are expected to exceed thresholds of significance under the Existing With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain ***significant and unavoidable*** at 7 roadway segments, and 14 freeway segments.
- Implementation of the proposed project would result in unacceptable operations of study facilities in 2024. Of those facilities, 4 intersections, 13 roadway segments, and 17 freeway segments are expected to exceed thresholds of significance under the 2024 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain ***significant and unavoidable*** at 1 intersection, 10 roadway segments, and 17 freeway segments. It should be noted for informational purposes that traffic impacts around SDIA would generally be the same in the future with or without the project due to future growth in passenger activity levels at SDIA that would occur regardless of the proposed project. The one notable exception to this would be at North Harbor Drive where the new on-airport access road proposed as part of the project would remove some airport-related traffic from that road, thereby improving traffic conditions on North Harbor Drive, as compared to future conditions if the proposed project was not implemented.
- Implementation of the proposed project would result in unacceptable operations at study facilities in 2026. Of those facilities, 4 intersections, 14 roadway segments, and 19 freeway segments are expected to exceed thresholds of significance under the 2026 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain ***significant and unavoidable*** at 1 intersection, 11 roadway segments and 19 freeway segments. As explained above, future traffic conditions and impacts would be generally the same if the proposed project was not implemented.
- Implementation of the proposed project would result in unacceptable operations of study facilities in 2030. Of those facilities, 8 intersections, 20 roadway segments, and 21 freeway segments are expected to exceed thresholds of significance under the 2030 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than significant level; however, some proposed mitigation is infeasible and other measures only partially mitigate impacts, therefore, impacts would remain ***significant and unavoidable*** at 2 intersections, 18 roadway segments and 21 freeway segments. As explained above, future traffic conditions and impacts would be generally the same if the proposed project was not implemented.

- Implementation of the proposed project would result in unacceptable operations of study facilities in 2035. Of those facilities, 13 intersections, 20 roadway segments, and 21 freeway segments are expected to exceed thresholds of significance under the 2035 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible and other measures only partially mitigate impacts, therefore, impacts would remain **significant and unavoidable** at 4 intersections, 18 roadway segments and 21 freeway segments. As explained above, future traffic conditions and impacts would be generally the same if the proposed project was not implemented.
- Implementation of the proposed project would result in unacceptable operations of study facilities in 2050. Of those facilities, 26 intersections, 25 roadway segments, and 22 freeway segments are expected to exceed thresholds of significance under the 2050 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain **significant and unavoidable** at 26 intersections, 23 roadway segments, and 22 freeway segments. As explained above, future traffic conditions and impacts would be generally the same if the proposed project was not implemented.

6.3 Significant Irreversible Environmental Effects

An evaluation of significant irreversible environmental effects that would be caused by implementation of the proposed project is required under CEQA Guidelines Section 15126.2(c). As indicated in Section 15126.2(c):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The environmental effects related to the implementation of the proposed project are discussed in Chapters 3 and 4 of this EIR. The project site is already developed and dedicated to airport uses. The land is converted tidelands that falls under the California Tidelands Trust to be used for the benefit of the people of California and in the movement and transport of people, goods, and services. Thus, the proposed project would not result in a new commitment of land. However, implementation of the proposed project would require the long-term commitment of resources such as lumber, aggregate (sand and gravel), metals (e.g., steel, copper, lead), and petrochemical construction materials (e.g., plastics). This would represent the loss of renewable, and non-renewable resources that are generally not retrievable.

Construction and operation of the proposed project would also require energy resources, such as electricity, natural gas, and various transportation-related fuels. This would represent the loss of

non-renewable resources, which are generally not retrievable. See Section 3.15, Utilities, for a discussion of energy impacts, as well as conservation measures that would be implemented. As described therein, there is sufficient capacity to serve the proposed project.

Nonrecoverable materials and energy would be used during construction and operation activities; however, the amounts needed would be accommodated by existing supplies. Further, SDIA is committed to construct the proposed project to meet high standards for efficiency and environmental design, consistent with Leadership in Energy and Environmental Design (LEED) standards. Implementation of LEED standards that emphasize strategies for sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality would reduce the use of renewable and nonrenewable resources that would continue over time through construction and long-term operation of the proposed project. In addition to the sustainability features of the proposed project's design, the numerous air pollutant emission/GHG reduction measures included in Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 and MM-TDM-1 would also serve to reduce the project's use of nonrecoverable materials and energy.

The proposed project would also comply with SDCRAA policies and programs related to sustainability that are implemented on a project-specific and on an Airport-wide basis. This would include energy and water conservation measures, recycling of non-hazardous materials, and other sustainability strategies that would be implemented during operation of the proposed project, to the extent feasible, which would reduce the use of resources.

Although conservation/sustainability measures would reduce the use of materials and energy used during construction and operation of the proposed project, they would nevertheless be unavailable for other uses. The resources utilized for the proposed project would be permanently committed to the proposed project and, therefore, be considered irreversible.

6.4 Growth-Inducing Impacts

CEQA Guidelines, Section 15126.2(d) requires the discussion of the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This includes ways in which the proposed project would remove obstacles to population growth or trigger the construction of new public service facilities or infrastructure that could cause significant effects. As discussed below, although the proposed project would lead to new job opportunities and accommodation of anticipated passenger growth, this would not stimulate significant population growth. Further, it would not remove obstacles to population growth, nor would it necessitate construction of new public service facilities or infrastructure that would lead to additional growth in the surrounding area.

6.4.1 Direct Growth-Inducing Impacts

A project would directly induce growth if it would remove barriers to population growth (e.g., a change to a General Plan and Zoning Ordinance that allowed new residential development to occur) or if it would result in economic growth that triggers an increase in population and housing through new housing construction and/or an influx of workers from outside the region.

The proposed project is an existing airport that is currently developed and used for aviation purposes. The proposed project does not include the development of new housing or population-generating uses or infrastructure that would directly encourage such uses. The residential area in the vicinity of the project site is primarily built out and any residential redevelopment or development of vacant lots cannot be attributed to the proposed project. As discussed in Section 3.11, Land Use and Planning, development of the area surrounding SDIA is governed by the City of San Diego General Plan and Community Plans, and the Port Master Plan. The proposed project would not result in any significant pressure to redevelop the area around SDIA at a higher density. It would not extend public service infrastructure into new areas or eliminate or change a regulatory obstacle that could result in new population growth.

The proposed project would accommodate forecast growth at the Airport. Operations will grow at SDIA and the projected future increase in passenger activity levels would occur at that same level even if the proposed project were not implemented. Further, the proposed project would not alter the airspace traffic, runway operational characteristics, or the capacity limitations of SDIA, as defined by the Airport's single-runway system; therefore, the proposed project would not increase the number of daily flights arriving and departing from SDIA or the growth in aviation activity that is projected to occur in the future.

The proposed project would create new short- and long-term employment opportunities. During project construction, design, engineering, and construction-related jobs would be created. This would be a temporary situation, lasting until each facility/phase of project construction is completed. Short-term construction impacts would directly affect employment in the area. However, short-term employees would likely come from the existing large labor pool within the San Diego area and would not result in new workers relocating to the area.

Similarly, the increase in employment needs from operation of the proposed project is not expected to result in population in-migration or relocation because of the large size of the workforce that currently exists in the San Diego region as a whole. Currently, there are approximately 4,785 employees working at SDIA. Under the proposed project, it is anticipated that by project build-out in 2035, the number of employees would increase to 5,713 (an increase of 928 employees). The increase of 928 employees would occur gradually over each phase of the proposed project and is expected to draw from the existing large labor pool within the San Diego area. In 2020, the size of the labor force in the City of San Diego is projected to be 867,641. This is expected to increase by 66,297 jobs to 933,938 jobs in 2035.² County-wide the labor force is projected to be 1,624,124 in 2020 and increase by 145,814 jobs to 1,769,938 jobs in 2035.³ Therefore, the increase of 928 employees in 2035 represents 1.4 percent of the projected employment increase City-wide from 2020 to 2035, and 0.6 percent of the projected County-wide increase from 2020 to 2035. Given the size of the existing labor pool and the prevalence of cross-county and intercommunity commuting by workers between their places of work and places of residence, it is unlikely that workers would change their place of residence in response to the proposed project; consequently, there would not

² San Diego Association of Governments. Series 13 2050 Regional Growth Forecast City of San Diego. October 2013. Available: <http://datasurfer.sandag.org/dataoverview>.

³ San Diego Association of Governments. Series 13 2050 Regional Growth Forecast San Diego Region. October 2013. Available: <http://datasurfer.sandag.org/dataoverview>.

be an increased need for new housing. Therefore, no significant increase in population and housing would be triggered by implementation of the proposed project. As a result, the proposed project would not result in a significant growth in population in the vicinity of the project site.

6.4.2 Indirect Growth-Inducing Impacts

A project would indirectly induce growth if it would foster economic or population-expanding activities, which would lead to further development that taxes existing facilities and eventually requires construction of new facilities (e.g., an increase in population as a result of development authorized by approval of a general plan).

The net increase in employment attributable to the proposed project would be approximately 928 jobs by 2035. This compares to a projected number of 1.8 million jobs in the San Diego region by 2035.⁴ Construction activities under the proposed project would also generate numerous additional jobs over the approximately 15-year construction period.

When jobs associated with the proposed project are compared to regional employment levels, the proposed project's contribution accounts for less than 0.1 percent of the regional employment levels by 2035. Given the highly-integrated nature of the regional economy and the prevalence of regional commuting by workers between their places of work and places of residence, it is unlikely that a substantial number of workers would change their place of residence in response to the new SDIA-related employment opportunities. Thus, in the absence of changes in places of residence by persons likely to fill new jobs, distributional effects on population and, consequently, housing assets are not likely to occur. Accordingly, negligible impacts on population, housing, and community services and infrastructure are anticipated. Because the proposed project would not involve development of housing and would not result in substantial direct increases in employment in the regional workforce, the proposed project would not have any significant effects on population growth that would tax existing facilities or require the construction of new facilities.

The proposed project would indirectly increase earnings to firms and households throughout the region as proposed project expenditures are spent throughout the region. For example, indirect effects from short-term construction and new long-term employment would incrementally increase activity in nearby retail establishments as a result of workers patronizing local establishments. Additionally, the increased passenger growth at the Airport would include increased numbers of visitors coming to the area that would contribute to the regional economy through expenditures at local businesses, such as hotels, restaurants, and attractions. While the increase in spending may contribute to the expansion of existing businesses or creation of new businesses, this growth would occur in a highly urbanized area with a large and integrated economy and local workforce. Overall, the long-term effects of the proposed project would be small relative to the size of the regional economy, and they would not significantly affect population distribution in the local area and region as a whole. Therefore, overall, the proposed project would not generate significant indirect growth-inducing impacts.

⁴ San Diego Association of Governments. Series 13 2050 Regional Growth Forecast San Diego Region. October 2013. Available: <http://datasurfer.sandag.org/dataoverview>.

6.5 Effects Not Found to Be Significant

In accordance with Section 15128 of the State CEQA Guidelines, an EIR must contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

Topics identified in the State CEQA Guidelines checklist that were not addressed in detail herein include:

- **Agriculture and Forestry Resources** – The proposed project is located at a developed airport in an urbanized area near Downtown San Diego. There are no agricultural operations or agricultural land located at or near the proposed project. Likewise, there is no forestland or timberland located at or near the project site. Therefore, construction and operation of the proposed project would not affect agriculture or forestry resources.
- **Mineral Resources** – The proposed project is located at a developed airport near Downtown San Diego on converted tidelands that is not available for mineral extraction. There are no known mineral resources that are of value to region or state located at the project site. Further, the project site is not available or suitable for mineral extraction and construction or operation of the proposed project would not result in loss of availability of mineral resource.
- **Population and Housing** – The proposed project would not result in the construction of new housing, or displacement of existing housing. While approximately 928 new long-term jobs would be created as a result of the proposed project, the new jobs would occur in a large metropolitan area with a large existing labor pool and existing housing stock. As such, it would not induce substantial population growth directly or indirectly.
- **Wildfire** – The proposed project is located at an existing international airport located within the City of San Diego and is not located near state responsibility areas or lands classified as very high fire hazard severity zones.

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