CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following docu``ment for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT INFORMATION

PROJECT TITLE: Non-Time Critical Removal Action Work Plan, IR Site 10 Shoreline Slag Area		SITE CODING: 400105-47, 14718, MPC - OTHplan
PROJECT ADDRESS: Naval Air Station, North Island	CITY: Coronado	COUNTY: San Diego
PROJECT SPONSOR: Naval Facilities Engineering Systems Command Southwest	CONTACT: Tinina Guzman	PHONE: 619-556-8940
APPROVAL ACTION UNDER CONSIDERATION BY DTSC: ☐ Initial Permit Issuance ☐ Permit Re-Issuance ☐ Permit Modification ☐ Closure Plan ☒ Removal Action Workplan ☐ Remedial Action Plan ☐ Interim Removal ☐ Regulations ☐ Corrective Measure Study/Statement of Basis ☐ Other (specify):		
STATUTORY AUTHORITY: ☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):		
DTSC PROGRAM/ADDRESS: Site Mitigation and Restoration Program	CONTACT: Daniel Cordero Jr	PHONE: 714-484-5428

PROJECT DESCRIPTION:

The proposed Project involves the approval of a Non Time-Critical Removal Action (NTCRA) for the Shoreline Slag Area (SSA) of Installation Restoration Site 10 at Naval Air Station North Island (NASNI). A radiological survey completed for the intertidal zone of the SSA showed elevated detections of Radium-226 (Ra-226) in various areas. The NTCRA would address areas of elevated Ra-226 activity by removing predominantly slag waste but would also involve removing surrounding sediment and soils with radiological impacts above the approved action levels. The following tasks would be performed:

- Mobilization and site preparation including a geophysical survey, land survey, setting up temporary facilities, establishing dust and erosion control measures, and waste management control areas.
- Pre-excavation gamma walkover survey (GWS) to identify the location of low-level radioactive materials (LLRMs) in the intertidal zone at the Installation Restoration (IR) Site 10 SSA.
- Excavation of slag wastes and point source LLRMs in the intertidal zone as described in the Engineering Evaluation/Cost Analysis (EE/CA) with temporary stockpiling and storage of waste materials.
- Multi-agency radiation survey and site investigation manual (MARSSIM) based on a final risk status survey (FRSS) of the surface sand/sediment confirmation sampling of excavated areas to meet the removal action objectives (RAOs) and remediation goals (RGs).
- Backfilling waste excavation areas with clean soil/sediment.
- Waste profiling and off-site transport and disposal.
- Site restoration.

BACKGROUND:

IR Site 10 SSA is located along the shoreline of San Diego Bay northwest of Moffett Road, at NASNI (refer to **Figure 1**). The SSA consists of 4.1 acres, which is mostly unpaved, and extends approximately 250 feet from Moffett Road to the shoreline of San Diego Bay (refer to **Figure 2**).

Reviews of historical engineering plans and aerial photography archived at the NASNI Staff Civil Engineer Office indicate that the IR Site 10 SSA was formerly occupied by tidelands. Dredge-and-fill operations performed from 1924 to 1936 extended the northwestern shoreline of NASNI to its present configuration and raised the tideland elevation by approximately 25 feet. The fill material was composed of sediments periodically dredged from the floor of San Diego Bay.

Military salvage operations began at a 10-acre site on the northwest shoreline of NASNI in the early 1930s and subsequently expanded. Historically, salvage operations at the IR Site 10 Operations involved the dismantling of aircraft and the disposition of military surplus materials. A former open-hearth furnace was also used from 1943 to 1967 at the salvage yard to recover metals from scrap aircraft parts. The metallic scrap materials included some aircraft instrumentation painted with Ra-226. Slag generated as a waste product of the smelter operation was transported approximately 500 yards from the smelter and disposed of at the intertidal zone and bluff adjoining the shoreline of San Diego Bay. Field observations indicate that slag disposal occurred after dredge-and-fill operations that extended and raised the northwestern shoreline of NASNI.

PROJECT ACTIVITIES:

Project activities that could likely create an impact to the environment include:

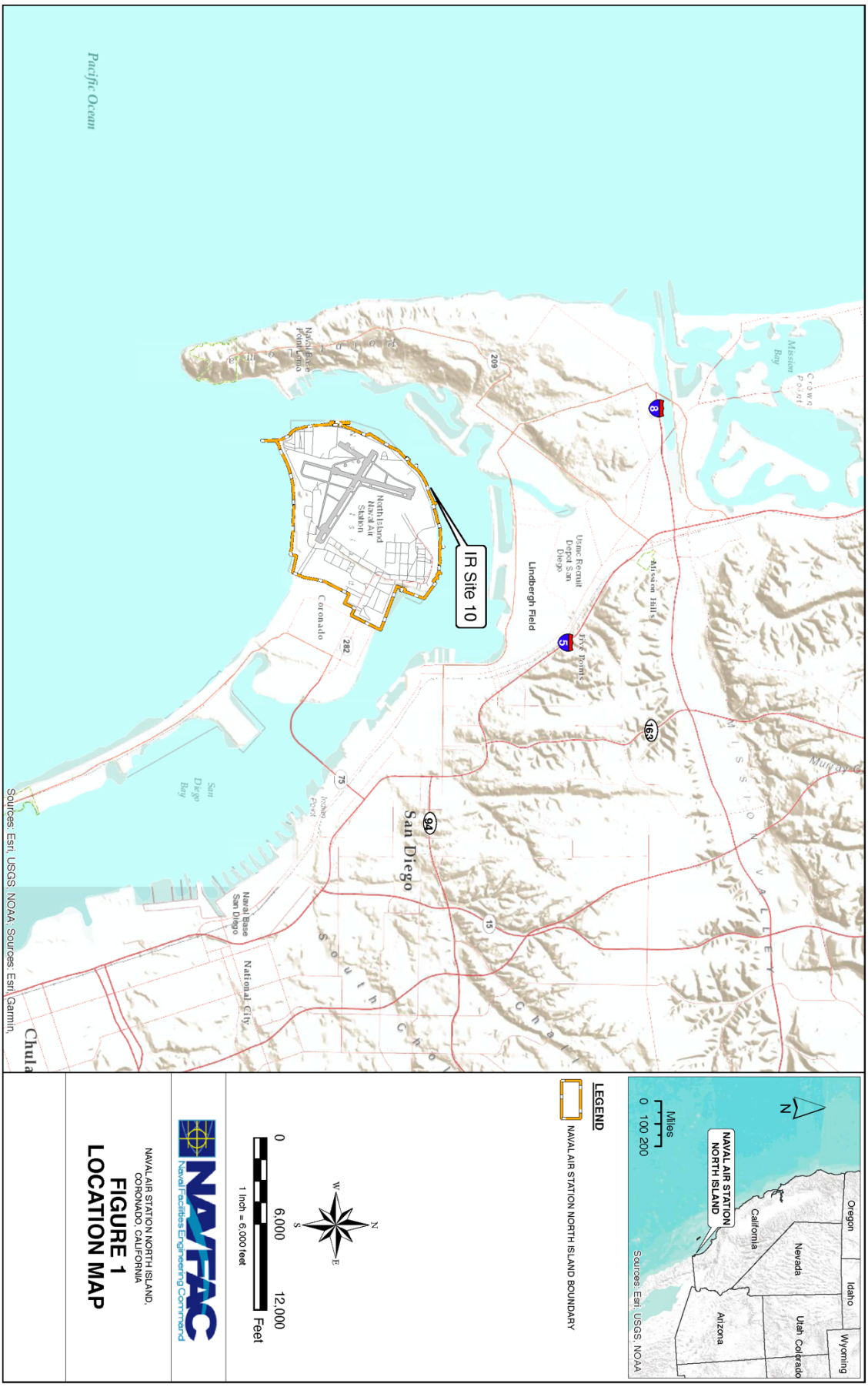
- Excavation of Slag wastes and point sources,
- Stockpiling of waste,
- Backfilling with clean soil,
- Transport of waste off-site, and
- Transport of clean soil to the site.

Project activities would require transportation of approximately 5,650 cubic yards (cy) of slag wastes to an off-site landfill for disposal. Transportation of the slag waste would require approximately 332 truck trips over a period of 6 months (which would equate to approximately 3 truck trips per day). After excavation, backfilling of approximately 8,800 cy of clean soil would be required to restore the site and bring it to final line and grade. Soil used for backfilling would be transported from offsite and, therefore, would require approximately 518 additional truck trips (8,800 cy soil / 17 cy per truck). Truck trips for backfill would also occur over a period of 6 months (which would equate to approximately 4 truck trips per day). Haul truck routes through the City of Coronado would involve the use of either 3rd and 4th Streets to/from the Coronado Bridge, 3rd and 4th Streets to/from Orange Avenue to/from Silver Strand Boulevard, or Ocean Boulevard to/from Silver Strand Boulevard.

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED: Department of Toxic Substances Control, San Diego Regional Water Quality Control Board

NATIVE AMERICAN CONSULTATION: DTSC complied with the 2014 Assembly Bill 52 (AB52). In 2017, DTSC held a meeting for Tribal Authorities requesting information about all projects that were progressing at NASNI. As part of identifying cultural and/or archaeological resources on military property, the military first evaluates a site with their cultural/archeological resources personnel. If cultural or archeological resources are not found, no notification to the Tribal Authorities is conducted. If cultural or archeological resources are identified, the military then contacts the identified Tribal Authorities. No cultural or archeological resources have been identified at NASNI Site 10. The inter-tidal area (project site) was created by the military with dredge fill in the 1930s and expanded in subsequent years.

Based on the SSA location, history, and absence of cultural resource findings, it is not likely that historical resources would be identified or impacted during remedial actions. However, if historical resources are discovered during remedial actions, then work would stop in that area until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC and other agencies and Native American representatives, as appropriate. Please see the Tribal Cultural Resources Section (Section 18) for additional information.


IR Site 10
North Island Naval Air Station
Coronado
San Diego
Pacific Ocean
Lindbergh Field
Naval Base Point Loma
Naval Base San Diego
National City
Chula
Sources: Esri, USGS, NOAA, Sources: Esri, Garmin,
NAVAL AIR STATION NORTH ISLAND
Oregon
California
Nevada
Idaho
Utah
Colorado
Wyoming
Arizona
Miles
0 100 200
Sources: Esri, USGS, NOAA
LEGEND
NAVAL AIR STATION NORTH ISLAND BOUNDARY
0 6,000 12,000
Feet
1 Inch = 6,000 feet
NAVFAC
Naval Facilities Engineering Command
NAVAL AIR STATION NORTH ISLAND,
CORONADO, CALIFORNIA
FIGURE 1
LOCATION MAP

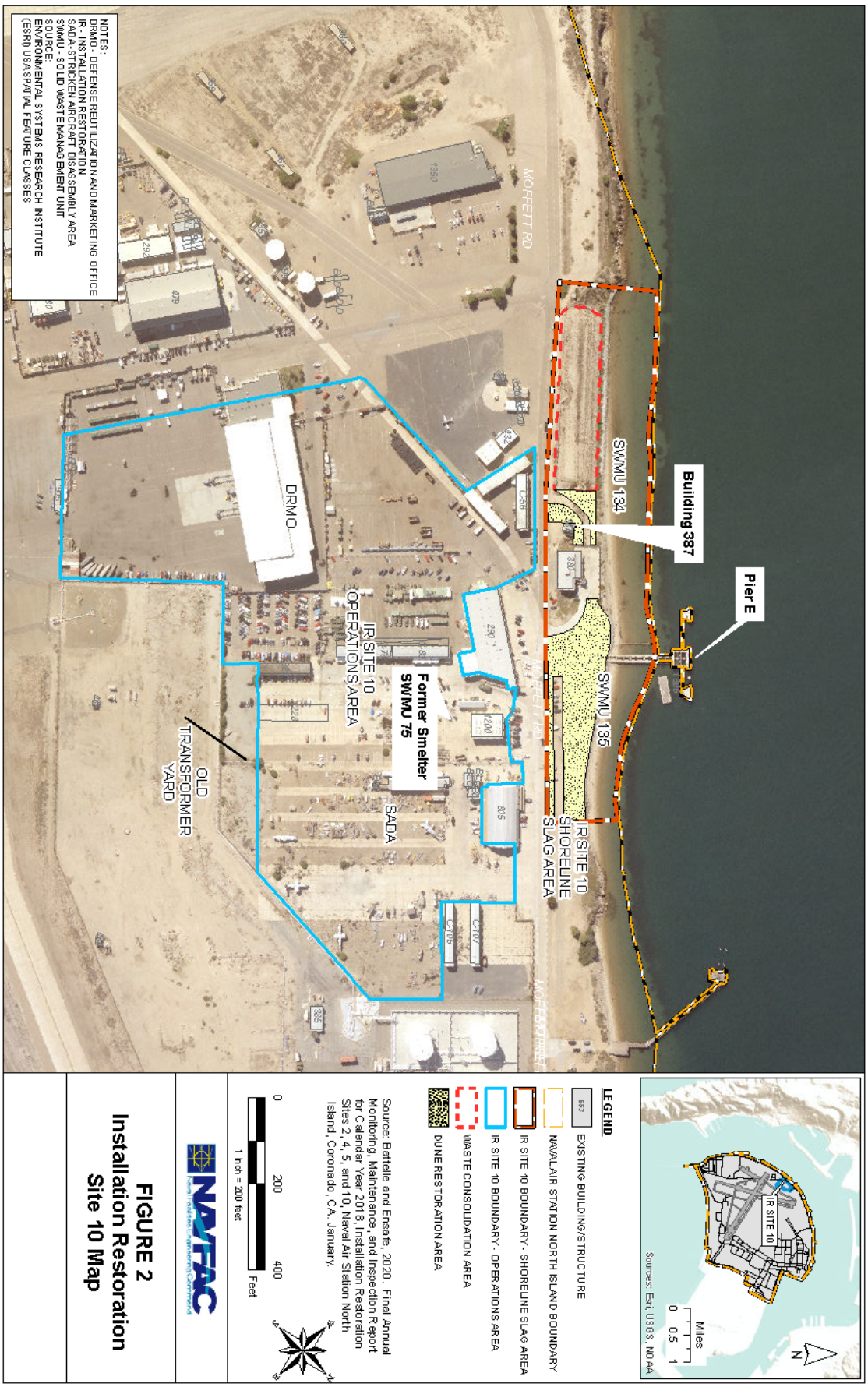


FIGURE 2
Installation Restoration
Site 10 Map

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist beginning on page 9. Please see the checklist beginning on page 9 for additional information.

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

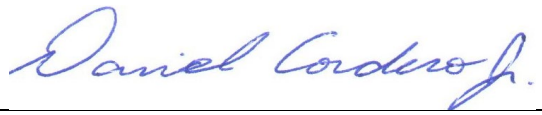
DETERMINATION

On the basis of this initial evaluation:

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CERTIFICATION

I hereby certify that the statements furnished above and in the attached documentation, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.



Preparer's Signature		May 2, 2022 Date
Daniel Cordero Jr Preparer's Name	Senior Hazardous Substances Engineer Preparer's Title	714-484-5428 Phone #

Branch or Unit Chief Signature		May 3, 2022 Date
Alexander Morelan Branch or Unit Chief Name	Environmental Program Manager 1 Branch or Unit Chief Title	714-484-5440 Phone #

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

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

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

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

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

California Scenic Highway Program

The Scenic Highway Program allows county and city governments to apply to the California Department of Transportation (Caltrans) to establish a scenic corridor protection program which was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

ENVIRONMENTAL SETTING (BASELINE): IR Site 10 SSA is located at NASNI along the southwestern portion of Moffett Road and is not publicly accessible. The site is adjacent to and visible from the San Diego Bay. The Coronado Bridge, CA-75, is located approximately 4 miles distant to the south, but the SSA does not face the Coronado Bridge.

APPLICABLE THRESHOLDS OF SIGNIFICANCE: The significance determination in this visual analysis is based on consideration of: (1) the extent of change related to visibility of the IR Site 10 SSA from key public vantage points; (2) the degree of visual contrast and compatibility in scale and character between project activities and the existing surroundings; (3) conformance of the proposed project with public policies regarding visual and urban design quality; and (4) potential adverse effects on scenic vistas and scenic resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY: No project-specific environmental studies related to aesthetic resources were prepared for the proposed project. However, the methodology employed for assessing potential aesthetic impacts involved considering the existing viewshed and the project activities that have the potential to change the project-area visual character.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista?

Impact Analysis:

The Proposed Project would implement remedial actions to address impacted soils including excavation of the SSA of slag waste. No new above ground structures or modifications to existing structures would occur with implementation of the Proposed Project. Therefore, no adverse effects on the view of the nearest scenic ridge or waterway local vantage points would occur. The nearest scenic vistas (Point Loma, Coronado Bridge) are located over four miles distant from the SSA. Temporary construction activities at the SSA would occur for approximately 6 months. The short-term construction activities would not result in any long-term adverse effects to a scenic vista.

Conclusion:

Components of the proposed remedial actions and the short-term construction activities would not have the potential to substantially affect the view of a scenic ridge or waterway. Therefore, there would be no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The nearest roadway to the SSA that is officially designated as a California State Scenic Highway is a section of Route 75, located 4 miles to the southeast. The nearest roadway to the Proposed Project Site that is identified as eligible for California State Scenic Highway Program is another segment of Route 75, located 3 miles to the southeast from the SSA (CalTrans 2022). There are no views of the SSA from these sections of Route 75.

The SSA has been used for military purposes for over a half century and currently is used for ongoing military uses. No scenic resources would be damaged with implementation of the proposed remedial actions.

Conclusion:

Scenic resources (e.g., trees, rock outcroppings, historic buildings) would not be disturbed or damaged through implementation of proposed remedial actions. Implementation of the proposed project would not result in any impacts to scenic resources.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

Publicly accessible vantage points of the SSA only include the adjacent San Diego Bay. The SSA has been used historically for military uses and the visual character of the SSA currently reflects the Site's long-term uses. Although construction activities would occur for approximately 6 months at the SSA, implementation of the proposed remedial actions within the intertidal zone would not alter the long-term visual character or quality of the SSA. The SSA would appear the same after remedial actions are completed.

Conclusion:

Based on the temporary nature of the construction activities and the overall unaltered, end-state of the SSA, no impact related to substantially degrading the existing visual character or quality of public views of the SSA would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Impact Analysis:

The remedial actions would be conducted during daytime hours and e not anticipated to require any night-shift or swing-shift work. The nearest sensitive receptors (i.e., residences) are located to the southeast in the City of Coronado approximately two miles distant. Any nighttime lighting used during construction activities would be occasional and limited to a relatively small work area and would not introduce any new temporary or permanent sources of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Conclusion:

Project activities would not require nor introduce a new temporary or permanent source of substantial light or glare that would adversely affect views in the project area. Therefore, implementation of the proposed remedial actions would result in no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Transportation. 2021. California Scenic Highway Program. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (Accessed February 2022).

2. AGRICULTURE AND FORESTRY RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting agriculture or forestry resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):
The proposed project site is not located in or near any agricultural or forestry resources. The proposed project site is an intertidal zone of the SSA. The SSA is not located on or in proximity to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of agriculture or forestry resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of agricultural or forestry resources in or near the IR Site 10 SSA, no environmental studies relating to agriculture or forestry resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Impact Analysis:

The closest designated Farmland is approximately 9 miles from the proposed project site (DRLP, 2022). Project-related activities would remain within the proposed project site boundaries (intertidal zone of the SSA). Therefore, no impact to designated Farmland would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Impact Analysis:

Project-related activities would remain within the proposed project site boundaries (intertidal zone of the SSA) and is not designated as farmland. Therefore, project-related activities would not have the potential to conflict with any Williamson Act contracts. No impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Impact Analysis:

There is no land with existing zoning of forest land or timberland within the proposed project site. Proposed Project-related activities would not conflict with existing zoning or cause rezoning of forest land or timberland, as none exists within the proposed project site boundaries. Project-related activities would remain within the proposed project site boundaries (intertidal zone of the SSA). Therefore, there would be no impact to forest land or timberland.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Result in the loss of forest land or conversion of forest land to non-forest use?

Impact Analysis:

There are no forests or timberland on or near the proposed project aite and the proposed project would not convert any land to forest or timberland. Project-related activities would remain within the proposed project site boundaries (intertidal zone of the SSA). Therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses?

Impact Analysis:

The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or agricultural land. Therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Conservation, Division of Land Resource Protection (DLRP). 2021. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (Accessed January 2022)

3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal Regulations

Clean Air Act (1970): The Environmental Protection Agency (EPA) is responsible for implementing most aspects of the Clean Air Act, including setting National Ambient Air Quality Standards (NAAQS) for major air pollutants; setting hazardous air pollutant (HAP) standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric O_3 protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

Hazardous Air Pollutants: The 1977 federal Clean Air Act amendments required EPA to identify national emission standards for hazardous air pollutants to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals.

State Regulations

California Clean Air Act: The Federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to California Air Resources Board (CARB), with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. Air quality is considered “in attainment” if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The NAAQS and CAAQS are presented in Table 9, “Ambient Air Quality Standards.”

Air Toxics Program: The California Toxic Air Contaminates (TAC) list identifies more than 700 pollutants, of which carcinogenic and non-carcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. The Legislature enacted the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) to address public concern over the release of TACs into the atmosphere. AB 2588 law requires facilities emitting toxic substances to provide local air pollution control districts with information that will

allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Local Regulations

The San Diego Air Pollution Control District (SDAPCD) establishes their air emission significance thresholds in Rule 20.2(d)(2). The purpose of their thresholds is to assist lead agencies in evaluating air quality impacts of projects and plans proposed in San Diego County. In this section, air quality is evaluated against numbers set forth in the SDAPCD rules.

ENVIRONMENTAL SETTING (BASELINE):

The climate of San Diego County is a year-round mild-to-hot and mostly dry climate for the San Diego metropolitan area. The climate is classified as a Mediterranean climate, which is a type of dry subtropical climate. It is characterized by seasonal changes in rainfall—with a dry summer and a rainy winter season.

San Diego County has a hot-summer Mediterranean climate with hot, dry summers and mild-to-warm winters with increased precipitation. While the typical dry-summer and wet-winter pattern typical of most Mediterranean climates is part of the climate of San Diego County, precipitation annually is lower than in many typical Mediterranean climates, giving it semi-arid characteristics.

Average summer high temperatures are in the lower 80's Fahrenheit (F) with overnight lows in the lower 60's F. During this season there is essentially no rainfall, and both July and August average less than 0.05 of an inch of monthly precipitation. The winter wet season normally runs from November through April. The normal seasonal rainfall measured at downtown San Diego is 14.77 inches of which 92% falls between November 1 and April 30. While there is a great increase in rainfall in the winter months, the winter months in Los Angeles are still frequently sunny and pleasant with mild-to-warm temperatures with average highs range from the upper 60's F to lower 70's F with cooler overnight lows in the upper 40's and lower 50's F.

Many industrial facilities, including chemical plants and refineries that generate emissions, are located within San Diego County. Although pollution levels in the basin are often reduced due to prevailing marine winds from the west, operations at these industrial facilities can result in short-term elevated emissions of pollutants, making buffer zones around the facilities important. Receptors residing downwind of these facilities may be more exposed to pollutants for longer periods than receptors residing elsewhere.

San Diego County is in attainment for National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for carbon monoxide (CO), nitrogen oxide (NOx), sulfur oxide (SOx), and lead. San Diego County is in non-attainment for particulate matter less than 10 microns in size (PM10) and particulate matter less than 2.5 microns in size (PM2.5) (SDAPCD 2022). As previously mentioned, the IR Site 10 SSA is located within San Diego County and the SDAPCD is primarily responsible for enforcing air quality standards, in accordance with standards set by the California Air Resources Board (CARB) and the United States Environmental Protection Agency.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The SDAPCD Air Pollutant Thresholds for Stationary Sources for air emissions are shown in Table 3.1 below (SDAPCD 2019). If project-related air emissions are below these thresholds, the impacts are considered less than significant, even if peak days have emissions over the thresholds.

TABLE 3.1

SAN DIEGO AIR POLLUTION CONTROL DISTRICT
POLLUTANT THRESHOLDS FOR STATIONARY SOURCES

Criteria Pollutant or Precursor	Average Daily Emissions Threshold of Significance (pounds/day)
PM_{10}	100
$PM_{2.5}$	67
NOx	250
SOx	250
CO	550
Lead	3.2

Notes:
NOx = nitrogen oxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SOx = sulfur oxide
CO = carbon monoxide

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The life-cycle analysis-based tool SiteWise(TM) Version 3.2 was used to estimate the emissions resulting from on-site equipment operation for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis:

Construction-related activities would result in emissions of ozone precursors (NOx and reactive organic gases [ROG]), particulates (PM_{10} and $PM_{2.5}$), air toxics, and greenhouse gases (project-related greenhouse gas emissions are analyzed separately in Section 8 of this Initial Study/Negative Declaration). Emissions for construction activities associated with implementing the proposed remedial actions were performed in accordance with the SDAPCD Air Pollutant Thresholds for Stationary Sources, using the life-cycle analysis-based tool SiteWise(TM) Version 3.2 and the results are shown in Table 3.2 below.

TABLE 3.2

THRESHOLDS OF SIGNIFICANCE FOR CONSTRUCTION-RELATED CRITERIA AIR POLLUTANTS AND PRECURSORS

Criteria Pollutant or Precursor	Average Daily Emissions Threshold of Significance (pounds/day)	Estimated Unmitigated Proposed Project Maximum Daily Emissions (pounds/day)	Is Threshold of Significance Exceeded?
PM_{10}	100	1.76	NO
$PM_{2.5}$	67	0.20	NO
NOx	250	0.31	NO
SOx	250	0.20	NO
CO	550	0.003	NO
Lead	3.2	1.91	NO

Notes:
NOx = nitrogen oxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SOx = sulfur oxide
CO = carbon monoxide

As shown in Table 3.2, project-related construction activities would generate air emissions below SDAPCD Air Pollutant Thresholds for Stationary Sources.

Conclusion:

The SiteWise results indicate that the project-related emissions would be below the SDAPCD Air Pollutant Thresholds for Stationary Sources. The short-term construction activities of the proposed project would not conflict with or obstruct implementation of the SDAPCD Air Quality Management Plan. Therefore, project impacts are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard

The proposed project region is non-attainment for ozone, PM2.5, and PM10 (SDAPCD, 2022). As shown in Table 3.2 above, the proposed project-related emissions of these pollutants would not exceed any of the thresholds of significance established in the SDAPCD Air Pollutant Thresholds for Stationary Sources.

Health Effects of Criteria Air Pollutants

Reactive organic gases (ROG) and nitrous oxides (NO_x) are precursors to ozone (O_3), for which the SDAPCD is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of ROG and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in San Diego County due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the ROG emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to reliably and meaningfully assess this impact. Thus, a project's ROG and NOx emissions are evaluated in the context of the SDAPCD significance thresholds, which define the levels of emissions that can occur without causing or contributing to violations of the NAAQS or CAAQS. In turn, the NAAQS and CAAQS define the pollutant concentrations above which adverse health effects are expected to occur. Nonetheless, because ROG and NO_x emissions associated with project construction would not be potentially significant, the project would not contribute to regional O_3 concentrations and any associated health effects.

Health studies for health effects related to particle pollution (PM_{10} and $PM_{2.5}$) have shown a significant association between exposure to particle pollution and health risks, including premature death. Health effects may include cardiovascular effects such as cardiac arrhythmias and heart attacks, and respiratory effects such as asthma attacks and bronchitis. Exposure to particle pollution can result in increased hospital admissions, emergency room visits, absences from school or work, and restricted activity days, especially for those with pre-existing heart or lung disease, older people, and children. The size of particles is directly linked to their potential for causing health problems. Fine particles ($PM_{2.5}$) pose the greatest health risk because these fine particles can get deep into lungs, and some may even get into the bloodstream. Exposure to these particles can affect a person's lungs and heart. Coarse particles (PM_{10}) are of less concern, although they can irritate a person's eyes, nose, and throat.

Conclusion:

Construction activities associated with implementing the proposed project would generate emissions of non-attainment pollutants that are below the thresholds of significance identified in SDAPCD Air Pollutant Thresholds for Stationary Sources. Therefore, implementation of the proposed project would result in a less-than-significant impact to the net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

The California Air Resources Board (CARB) defines sensitive receptors as children, elderly, asthmatics, or others who are at a heightened risk of negative health outcomes due to exposure to air pollution. For the

purposes of this analysis, the locations where these populations can typically congregate (e.g., schools, hospitals) are considered sensitive receptor locations. Remedial actions associated with implementing the proposed project would take place in a functioning military airbase. The closest sensitive receptor (Coronado elementary, middle, and high school) is located approximately 2 miles to the southeast of the proposed project site.

The proposed project would also establish upwind and downwind dust monitoring stations to monitor emissions during excavation and grading activities, transfer of excavated materials to stockpiles and/or roll-off bins, and truck loading for off-site transportation of wastes. Radiation exposure monitoring and environmental air sampling equipment and devices will be established at pre-determined restricted area boundary locations. Area air monitoring (continuous or grab samples) and engineering controls will be implemented during intrusive activities to mitigate fugitive dusts, control the spread of contamination, and the migration potential of radiological contaminants offsite. Actions to control any dust emissions will be implemented, if necessary, such as the use of engineering controls (e.g., wetting of soils).

Conclusion:

A school is located within approximately 2 miles from the proposed project site. Implementation of dust monitoring and dust minimization actions will keep potential impacts of exposing sensitive receptors to pollutant concentrations at a less-than-significant level.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Analysis:

Implementation of proposed remedial actions have the potential to generate odors during the operation of construction equipment, such as those experienced from diesel engine exhaust. The closest receptor of odors are residences located over one mile distance from the proposed project site.

The proposed remedial actions will perform air monitoring at the working areas and up- and down-wind areas near the SSA perimeter. Odors, such as those indicating hydrogen sulfide or sulfur dioxide, will be monitored with personal indicator badges. Nuisance odors will be evaluated by an onsite, trained individual.

Conclusion:

Project-related odors during construction activities would be actively monitored to ensure no discernable odors are experienced by the closest receptors (i.e., residences). Therefore, implementation of the remedial actions would not result in emissions that could adversely affect a substantial number of people.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

San Diego Air Pollution Control District (SDAPCD), 2022. *Attainment Status*. Available at: https://www.sdapcd.org/content/sdapcd/planning/attainment-status.html (Accessed January 28, 2022).

SDAPCD, 2019. *Rule 20.2, New Source Review, Non-Major Stationary Sources (adopted 6/26/19)*. Available at: https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-20.2.pdf (Accessed January 28, 2022).

4. BIOLOGICAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Applicable statutes and regulations to the Proposed Project include:

Federal Endangered Species Act (ESA): (16 United States Code (USC) § 1531-1544, 50 Code of Federal Regulations (CFR) Part 17). The Federal ESA provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found.

Federal Migratory Bird Treaty Act (MBTA): (16 USC § 703-712, 50 CFR Part 21). The MBTA makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid Federal permit.

California Endangered Species Act (CESA): (Fish and Game Code (FGC) chapter 1.5, sections 2050-2115.5, California Code of Regulations (CCR), title 14, chapter 6, § 783.0-787.9). CESA protects or preserves all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation.
CESA states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved.

Additionally, the California FGC § 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird; and § 3513 prohibits the take or possession of any migratory nongame bird or part there of as designated in the MBTA. Any birds in the orders Falconiformes or Strigiformes (birds of prey, such as hawks and owls) are protected under FGC 3503.5, which makes it unlawful to take, posses, or destroy their nest or eggs.

ENVIRONMENTAL SETTING (BASELINE):

The IR Site 10 SSA is surrounded by urban uses (i.e., military airbase). There are no federally protected wetlands on the proposed project site. No known native residents, migratory fish, wildlife species, nursery sites or corridors are present at the site. The remedial actions would primarily occur in a zone referred to as the "intertidal zone." The intertidal zone is an area where the ocean meets the land between high and low tides.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of biological resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A biological survey of the IR Site 10 SSA was performed on April 29, 2000, to identify potentially sensitive plant or animal species present at or in the immediate vicinity of the site that could be impacted by the planned remedial actions. The survey indicated the presence of nuttall's lotus plants in the vicinity of the site but not in the intertidal zone. The nuttall's lotus plant is classified as a federal species-of-special-concern and is considered extremely rare by the California Native Plant Society. During an Ecological Risk Assessment conducted in 1995, an eel grass bed was identified on the bay floor approximately 20 feet from the shoreline.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact Analysis:

Urban development surrounding the SSA and other activities in the general project vicinity has reduced or, in some cases, eliminated connectivity to undisturbed natural habitats in the area. However, some animals have adapted to these types of conditions and are expected to traverse the proposed project site such as raptors and other birds protected by the MBTA and California FGC Code. However, the SSA does not contain any habitat suitable for foraging or nesting and implementation of remedial actions would not result in direct disturbance of any biological habitat.

Nuttal's lotus, a plant classified as a federal species-of-special-concern and considered extremely rare by the California Native Plant Society, is present in the vicinity of the SSA but is not located in the intertidal zone where the excavation activities would take place. An eel grass bed has been identified on the bay floor approximately 20 feet from the shoreline. It is not anticipated that eel grass is present within the intertidal zone. However, a baseline habitat survey would be conducted as part of the pre-removal action to identify any potential sensitive habitat offshore including eel grass areas. If sensitive habitat areas are identified offshore in the SSA, protective actions would be implemented as part of the excavation. Specifically, the baseline habitat surveys for the species of concern, such as eel grass, will be performed prior to work to ensure plants present at the site are not disturbed. In addition, a species of special concern, the Nuttall's lotus, has been identified as present at IR Site 10. While there are no applicable or relevant and appropriate requirements for species of special concern, implementation of the baseline habitat surveys would ensure that remedial activities do not disturb this species (NAVFAC 2020).

Conclusion:

The proposed project site does not contain any suitable habitat for foraging or nesting of special status species. Protective actions would be implemented if eel grass is identified during a baseline habitat survey. Therefore, proposed remedial actions would not have the potential to adversely affect special status species.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Impact Analysis:

The proposed project site does not contain any riparian habitat or sensitive natural community. The SSA is s located in the intertidal zone and is surrounded by a developed, urban area. Implementation of remedial actions would not result in direct disturbance of any riparian habitat or sensitive natural community. There would be no impact.

Conclusion:

Riparian habitat is not located on the proposed project site and implementation of proposed remedial actions would not have the potential to effect on any riparian habitat or other sensitive natural community.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Analysis:

Remediation activities would not occur in any wetland areas and would only occur in the SSA. The project site is located in the intertidal zone and is surrounded by a developed, urban area. Implementation of remedial actions would not result in direct disturbance of any wetlands. There would be no impact.

Conclusion:

Wetlands are not located on the proposed project site and implementation of remedial actions would not have the potential to affect any state or federally protected wetlands.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Analysis:

Based on the temporary nature and duration of the remedial actions and the location of the proposed project site, which is located in the intertidal zone and is a heavily disturbed urban setting, there would not be the potential to interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

Conclusion:

There are no established native resident or migratory wildlife corridors, or native wildlife nursery sites located on or near the proposed project site. The remedial actions would not have no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis:

Biological resources that may be present or in close proximity to the SSA are covered under the Naval Base Coronado Integrated Natural Resources Management Plan which is consistent with the intent of the Endangered Species Act, Migratory Bird Treaty Act and Clean Water Act. There are no biological resources on the proposed project site that are protected by local policies or ordinances.

Conclusion:

Implementation of the proposed remedial actions would not conflict with any local polices or ordinances for the purposes of protecting biological resources.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

Biological resources that may be present or in close proximity to the SSA are covered under the Naval Base Coronado Integrated Natural Resources Management Plan which is consistent with the intent of the Endangered Species Act, Migratory Bird Treaty Act and Clean Water Act. The proposed project would not in conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conclusion:

The proposed remedial actions would not have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Naval Facilities Engineering Command (NAVFAC), 2020. *Draft Engineering Evaluation/Cost Analysis Installation Restoration Site 10 Shoreline Slag Area*. Prepared by ECC Insight Philotechnics. Dated October 2020.

5. CULTURAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The definition of historical resources can be found in PRC §21084.1 and 14 CCR § 15064.5. Unique archaeological resources are defined in PRC § 21083.2 and 14 CCR § 15064.5. Tribal cultural resources are defined in PRC Div. 13 Section 21074.

California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe (PRC 21081.3.1). Please refer to Section 18, Tribal Cultural Resources, of this Initial Study for additional discussion.

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code (HSC) 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

There are numerous archaeological Sites within San Diego County that have been recorded with the Archaeological Inventory Report, Northwest Information Center (NWIC) at California State University Sonoma. However, the proposed project site is in a largely urbanized area (i.e., military airbase) excluded from the archeological sensitivity survey.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of undisturbed areas on or near the SSA, no environmental studies relating to cultural resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Impact Analysis:

Historical resources, as defined by 14 CCR section 15064.5, have not been identified at the proposed project site. The SSA is located in the intertidal zone. Based on the proposed project site location, history, and absence of resource findings during prior site work, it is highly unlikely that historical resources would be identified or impacted. However, if historical resources are discovered during the remediation activities, then ground disturbing activities within 25 feet would stop until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC, Navy, and other agencies and Native American representatives, as appropriate.

Conclusion:

The proposed project would not include demolition, elimination, or manipulation of a historical resource. In addition, the finding of a historical resource during implementation of the remedial actions is unlikely based on the proposed project site history and conditions, and absence of findings during prior onsite work. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known historical resource.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact Analysis:

Archaeological resources, as defined by 14 CCR section 15064.5, have not been identified at the proposed project site. The SSA is located in the intertidal zone. Based on the proposed project site location, history, and absence of resource findings during prior onsite work, it is highly unlikely that archaeological resources would be identified or impacted. In addition, there is no unique geologic feature at the site and the presence of a unique paleontological resource in the proposed project work area is unlikely. However, if archaeological resources are discovered during the remediation activities, then ground disturbing activities within 25 feet would stop until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC, Navy, and other agencies and Native American representatives.

Conclusion:

The proposed project would not include demolition, elimination, or manipulation of an archaeological resource. In addition, the finding of an archaeological resource during implementation of the remedial actions is unlikely based on the proposed project site history and conditions, and absence of findings during prior onsite work. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known archaeological resource.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Analysis:

There are no known human remains on or near the project site and given the repeated disturbance of the site and the surrounding area, the potential for such remains to be present is considered extremely low. If human remains are encountered, the County Coroner would be immediately notified. No further ground disturbing activities shall occur within 25 feet of the work area until the County Coroner has made a determination of origin and disposition, pursuant to PRC § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) and the County Coordinator of Indian Affairs.

Conclusion:

Implementation of remedial actions is not expected to encounter or disturb any human remains, including those interred outside of dedicated cemeteries. If human remains are encountered, procedures will be followed to prevent disturbing the remains and ensure compliance with applicable codes and regulations.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

6. ENERGY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings.

ENVIRONMENTAL SETTING (BASELINE):

Electrical power and natural gas are provided to the proposed project site by San Diego Gas and Electric (SDGE). SDGE obtains its electricity supplies from power plants and natural gas fields in northern California and from energy purchased outside its service area and delivered through high voltage transmission lines. SDGE obtains its natural gas supplies from natural gas fields in northern California and from sources outside of California.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of energy resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of significant increase in energy demand from the proposed project site, no environmental studies relating to energy resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

Impact Analysis:

To implement the proposed project, it is expected that construction equipment (e.g., tractors, excavators, loaders, generators, trucks, light-duty vehicles) would use petroleum fuels (diesel and gasoline products) and would not use on-site electricity or natural gas sources. Implementation of the proposed remedial actions would occur over a short duration (6 months) and, therefore, the wasteful, inefficient, or unnecessary use of petroleum fuels would not occur. Construction contractors would use existing office space at the proposed project site. Implementation of the proposed project would not result in adding any new facilities that would increase the demand for energy resources.

Conclusion:

The proposed project would not add new facilities that could increase the demand for energy resources. Construction activities would use equipment in accordance with manufacturer's specifications. Therefore, implementation of the proposed remedial action would not result in a wasteful, inefficient, or unnecessary

consumption of energy resources. In addition, implementation of proposed remedial actions would not result in a new permanent energy demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings. Implementation of proposed remedial actions would not result in constructing any new buildings that would increase the demand for energy resources, renewable or otherwise.

Conclusion:

The proposed project would not construct new facilities or permanent structures and would not generate any new energy demands. Therefore, the Proposed Project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Legislative Information. 2015. *SB-350 Clean Energy and Pollution Reduction Act of 2015.* Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350 (Accessed February 24, 2022).

7. GEOLOGY AND SOILS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting geological or soil resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

No faulting has been identified within IR Site 10 from boring logs or mapping data. The structural basin is bounded to the west by the Point Loma Fault Zone and to the northeast by the Rose Canyon Fault Zone. The northerly trending Spanish Bight Fault, approximately 8,500 feet east of the SSA, is interpreted to be possibly active due to its association with the Rose Canyon Fault Zone.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of geological and soils resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The list of geological and soils resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Impact Analysis:

The Proposed Project Site is located near an Earthquake Fault Zone (within 8,500 feet of the northerly trending Spanish Bight Fault); however, no known earthquake fault crosses the site (CGS, 2022). Site workers would only be present for a short duration during remediation activities (6 months) and, therefore, the potential for exposure to substantial risk of injury to people would be limited. In addition, the proposed project involves excavation activities that would not expose people or structures to significant impacts from fault rupture associated effects.

Conclusion:

The proposed project site is identified as being near an Earthquake Fault Zone. However, the risk of loss, injury, or death involving from onsite ruptures would be limited because of the short duration of project activities and excavation activities that would reduce the potential exposure of people or structures to significant impacts from fault rupture associated effects.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

ii) Strong seismic ground shaking?

Impact Analysis:

The proposed project site is located in a seismically active area and the site may be exposed to moderate to strong shaking in the event of an earthquake in the region (CGS, 2022).

Implementation of remedial actions would require the use of heavy equipment and would place numerous workers onsite. Site workers would only be present for approximately 6 months; therefore, the potential for substantial risk or injury to people from seismic ground shaking would be limited. In addition, the remediation activities involve excavation that would not expose people or structures to significant impacts from strong seismic ground shaking if it were to occur.

Conclusion:

Even though the proposed project site is in a seismically active area and the site may be exposed to moderate to strong shaking if an earthquake occurred, the remediation activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from strong seismic ground shaking would be negligible.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis:

The SSA is located in the intertidal zone and would, therefore, also be located in an area that has a high liquefaction susceptibility. Due to liquefaction, which generally occurs at depths shallower than 50 ft-bgs, soils may lose their ability to support structures. However, proposed remedial actions would not involve building new structures.

Site workers would only be present for the short project duration (6 months), therefore the potential for substantial risk or injury to people would be limited. In addition, the proposed project involves excavation activities that would not expose people or structures to significant impacts from seismic-related ground failure, including liquefaction.

Conclusion:

Even though the SSA is in a high liquefaction susceptible area, remedial actions would not involve activities that would place buildings or people at risk of loss, injury, or death at significant risk if liquefaction.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iv) Landslides?

Impact Analysis:

The proposed project site is not located in an area that could be adversely affected by landslides. The proposed remediation actions would be performed on a flat area and there is little potential for substantial risk or injury from landslides.

Conclusion:

No landslide impacts from the on the SSA or nearby areas would occur relating to placing people or buildings at risk loss, injury, or death involving landslides.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Result in substantial soil erosion or the loss of topsoil?

Impact Analysis:
The proposed excavation would decrease the amount of potential soil erosion by implementing Best Management Practices (BMPs) to avoid erosion during field activities. In addition, contaminated soil will be replaced with clean fill and the SSA will be restored.

Conclusion:

Implementation of BMPs during the proposed remedial actions (i.e., excavation) and replacement with clean fill would limit the potential for soil erosion or loss of topsoil on the proposed project site. Impacts related to soil erosion and loss of topsoil would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Impact Analysis:

The proposed project site is flat with very little relief therefore the potential for slope instability, lateral spreading, or collapse are minimal. The soils beneath the proposed project site would not be subject to subsidence because remedial actions would not involve the removal of groundwater.

In addition, remediation of the proposed project site would not involve any activities that could result in liquefaction of existing onsite soils or imported soils (process by which saturated, unconsolidated soil or sand is converted into a suspension during an earthquake). The vibrations associated with the proposed work would be incapable of approximating those necessary to cause liquefaction.

Conclusion:

Characteristics of existing soils on the proposed project site would not be unstable or become unstable as a result of implementing the proposed project. This would be considered a less-than-significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact Analysis:

Expansive soils are characterized by their ability to undergo volume change due to variations in moisture content. Implementation of proposed remedial actions would not involve construction of new structures or facilities. Engineering considerations have been incorporated into the design of the remedial actions including compaction of materials prior to excavation activities.

Conclusion:

Proposed remedial actions would not result in any new structures or facilities being placed on expansive soils. In addition, remedial actions have been engineered to consider compaction of materials prior to excavation activities. Therefore, substantial risk to life or property from expansive soils would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

The proposed project activities would not require the use of septic tanks or alternative wastewater disposal systems nor involve construction of such new systems.

Conclusion:

The use or construction of septic tanks or alternative wastewater disposal systems are not part of the proposed remedial actions. No impact involving septic tanks or alternative wastewater disposal systems as a result of onsite soils would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

f. Directly or indirectly destroy a unique paleontological resources or site unique feature?

Impact Analysis:

Based on the proposed project site location, history, and absence of resource findings during prior onsite work, it is highly unlikely that paleontological resources would be identified or impacted. This is because excavation would primarily occur within the upper 2 feet and in the intertidal zone. The remediation activities are not expected to encounter or destroy any unique paleontological resources or geological features.

Conclusion:

There is no unique geologic feature at the Site and the presence of a unique paleontological resource in the proposed project work area is unlikely.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Conservation, California Geological Survey (CGS). 2021. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/ (Accessed February 24, 2022).

8. GREENHOUSE GAS EMISSIONS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The San Diego County Air Pollution Control District (SDCAPCD) *Guidelines for Determining Significance and Report Format and Content Requirements, Climate Change* (2013), recommend that greenhouse gases (GHGs) for projects be quantified and that the lead agency should make a determination on the significance of construction- and operational-related GHG emissions.

ENVIRONMENTAL SETTING (BASELINE):

Greenhouse gases are global pollutants, unlike criteria air pollutants that are of regional or local concern. The largest anthropogenic source of GHGs is the combustion of fossil fuels, which results primarily in emissions of carbon dioxide (CO_2). Other GHGs include methane, nitrous oxide, fluorinated gases, ozone, and sulfur hexafluoride. To account for the differences of the warming effects of various GHGs, emissions are standardized into carbon dioxide equivalents (CO_2e).

A GHG emissions inventory is available for the San Diego County for 2014 (San Diego County 2018). In 2014, approximately 3,212 metric tons (MMT) CO_2e were attributable to the San Diego County. Mobile sources contributed 1,493 MMT, stationary combustion sources contributed 959 metric tons, and purchased electricity contributed 760 MMT.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

A proposed project would have a cumulatively considerable contribution to climate change impacts if it would result in a net increase of greenhouse gas emissions, either directly or indirectly, at a level exceeding 10,000 metric tons of CO2e per year (San Diego County 2013).

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The life-cycle analysis-based tool SiteWise(TM) Version 3.2 was used to estimate the emissions resulting from materials use; personnel, equipment, and materials transportation; equipment operation; and residual handling for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis:

Implementation of proposed remedial actions would generate GHG emissions through mobilization of construction equipment; onsite delivery of materials, equipment and supplies; offsite shipment of waste materials; onsite use of vehicles and heavy equipment; worker commutes to the SSA; and demobilization activities. The SiteWise was run to identify the potential greenhouse gas emissions generated by implementation of proposed remedial actions. Results of the model indicate that remedial actions would generate approximately 330 metric tons of CO_2e per year during the construction period. Carbon dioxide equivalent, or CO_2e, is a term for describing different

greenhouse gases in a common unit. For any quantity and type of greenhouse gas, CO_2e signifies the amount of CO_2 which would have the equivalent global warming impact (Ecometrica 2012).

Construction activities associated with implementation of remedial actions would generate approximately 330 metric tons of CO_2e per year. This amount of CO_2e falls below the San Diego County stationary source threshold of significance of 10,000 metric tons of CO_2e per year.

Conclusion:

The proposed project would not result in a new permanent stationary or non-stationary source of GHGs and construction-related GHG emissions would be short-term and temporary. In addition, the estimated CO_2e emissions from implementing the remedial actions (300 metric tons of CO_2e per year) would fall below San Diego Greenhouse Gas Significance Thresholds operation-related maximum annual threshold (10,000 metric tons of CO_2e per year). Therefore, GHG emissions resulting from implementation of the proposed project are considered to have a less-than-significant impact on the environment.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis:

San Diego County is responsible for regulating GHG emissions in the project area. San Diego County identifies a stationary source threshold of significance of 10,000 metric tons of CO_2e per year. Construction activities associated with implementation of remedial actions would generate approximately 330 metric tons of CO_2e per year. This amount of CO_2e falls below the San Diego County Greenhouse Gas Significance Thresholds stationary source threshold of significance of 10,000 metric tons of CO_2e per year.

Conclusion:

The operation of construction equipment during implementation of remedial actions at the proposed project site would be short-term and temporary and would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. All remedial actions would be performed in compliance with the San Diego County rules and polices. No impact related to conflict with a GHG reduction plan would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

San Diego County, 2013. *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Climate Change*. November 7, 2013.

County of San Diego, 2018. *County of San Diego Climate Action Plan*. February 2018.

9. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal laws and regulations:

Resource Conservation and Recovery Act (RCRA) Title 42 United States Code and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, hazardous waste generators are governed by 40 CFR part 262, subpart E and transporters of hazardous waste governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste.

The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations:

Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology

and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste.

California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

The NTCRA would address areas of elevated Ra-226 activity by removal of predominantly slag waste, but also surrounding sediment and soils with radiological impacts above the approved action levels. The NTCRA would involve the use of heavy equipment and dump trucks to transport out waste material and bring in clean fill. A portion of the waste material sent for disposal is expected to meet the definition of a Hazardous waste.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hazards and hazardous materials effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance**.**

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Human health and ecological risk assessments performed for the proposed project site are summarized in the *Draft NTCRA Work Plan for Installation Restoration Site 10 Shoreline Slag Area* (NAVFAC, 2021).

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials?

Impact Analysis:

Hazardous materials used during implementation of remedial actions would include fuels and oils for standard operation of construction equipment. Proper storage and disposal and compliance with applicable laws and regulations governing the management of hazardous materials and hazardous waste would minimize potential impacts associated with the use of such materials. Construction activities are estimated to occur over a 6-month period during use and transport of hazardous materials, and management and/or transport of waste generated would occur.

Remedial actions would primarily involve excavation activities. The routine management, storage, and transport of materials would be consistent with all applicable federal and state laws. Any storage of hazardous or impacted materials would occur in a designated material-handling area with secondary containment. Accidental releases of hazardous or remediation materials would be minimized through the implementation of a Storm Water Pollution Prevention Plan (SWPPP), and with enhanced spill response training for construction workers. In addition, the proposed project would implement a Health and Safety Plan (HASP) which would describe, in detail, how potential for exposures would be minimized for all personnel who enter the Proposed Project Site and how migration of contaminated materials beyond the area would be prevented.

Conclusion:

The adherence to the SWPPP, HASP, and standard practices, implementation of remedial actions would not a create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials. Project-related impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact Analysis:

Implementation of remedial actions at the proposed project site have the potential to release hazardous materials into the environment during disturbance of contaminated soils; from an accidental release of fuel, oil, or maintenance chemicals from construction equipment; and/or from dust generated during excavation activities. During excavation activities, potential spills or releases of hazardous materials would be minimized through the following:

- Preparation and implementation of a SWPPP;
- Preparation and implementation of a HASP including requirements for workers and other construction management components such as dust and off-Site migration control; and
- Workers undertake training for all construction activities involving work in proximity to potentially contaminated soils in accordance with California Occupational Safety and Health Administration standards, contained in Title 8 of the CCR.
- Establishment and implementation of health and safety provisions for monitoring exposure to construction workers, procedures to be undertaken in the event that previously unreported contamination is discovered, and emergency procedures and responsible personnel.

Conclusion:

Remedial actions would be required to adhere to the requirements of hazardous waste management plans (i.e., HASP, SWPP) and to implement standard practices. Therefore, the proposed project potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?

Impact Analysis:

Coronado elementary, middle, and high school is located approximately 2 miles of the proposed project site. However, the proposed remedial actions would not involve activities that would disturb the existing contaminated soils in such a way that could impact offsite areas, including the Coronado elementary, middle, and high school.

Conclusion:
Implementation of remedial actions at the proposed project site would occur within 2 miles of the Coronado elementary, middle, and high school. Activities associated with the remedial actions would not disturb the existing contaminated soil in such a way that could impact offsite areas, including the Coronado elementary, middle, and high school.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact Analysis:

The Proposed Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Conclusion:

The Proposed Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, no impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact Analysis:

The Proposed Project Site is located within the boundaries of the Naval Air Station North Island (NASNI). However, the proposed excavation activities would not create a safety hazard or excessive noise for people residing or working in the project area.

Conclusion:

The proposed remedial actions would occur within the boundaries of the NASNI and implementation of the project would not result in a safety hazard or excessive noise for people residing or working in the project area.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

In the event of an emergency during proposed remedial actions, a Project Health and Safety Plan (HASP) will be developed and implemented which outlines the actions to protect workers during remedy implementation. The HASP includes contingency plans for spills, fires, or other emergencies during construction activities.

The transportation of equipment and materials to and from the proposed project site have the potential to impair implementation or interfere with the existing emergency response plan and/or evacuation plan. Specifically, trucks carrying equipment and materials could slow down the flow of traffic on public streets and potentially impede emergency response or evacuation efforts. However, the HASP includes a stop-work authority requirement for all work locations and workers and grants any worker the ability to stop work if an unsafe condition is identified that could cause substantial harm or imminent danger to health and safety of workers, the public, or the environment. As a result, if actions described in the HASP were to be implemented in response to an emergency, project management would be able to immediately suspend equipment and material transportation until the emergency response is completed or the evacuation order is lifted.

Conclusion:

The proposed project would implement a HASP that would allow for suspending construction activities that could impair implementation of an adopted emergency response plan or emergency evacuation plan. Impacts to an adopted emergency response plan or emergency evacuation plan are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Analysis:

The proposed project site is not located in an area with environmental conditions conducive to wildland fires. The project site is in an area lacking dry vegetation (urban area). However, operation of construction equipment on the during remedial actions has the limited potential to spark a fire.

Conclusion:

Although construction equipment has a minimal potential to spark a fire during remedial actions, implementation of BMPs would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the remedial actions are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Naval Facilities Engineering Command (NAVFAC), 2020. *Draft Engineering Evaluation/Cost Analysis Installation Restoration Site 10 Shoreline Slag Area*. Prepared by ECC Insight Philotechnics. Dated October 2020.

10. HYDROLOGY AND WATER QUALITY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The State Water Resources Control Board and the Regional Water Quality Control Boards (collectively Water Boards) share authority to implement the Federal Clean Water Act (CWA, 33 U.S.C. §1251 et seq.) and California's Porter-Cologne Water Quality Control Act (California Water Code, Section 7). The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters.

The Water Boards enforce waste discharge requirements through National Pollutant Discharge Elimination System (NPDES) permits. The Porter-Cologne Act mandates the Regional Water Board to develop, adopt and implement a Basin Plan for the Region. The Water Quality Control Plan for the Los Angeles Basin (Los Angeles Region Basin Plan) is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the Region.

The following are also applicable:

- The State Board published a resolution (SWRCB Resolution No. 88-63, as revised by Resolution No. 2006-0008) adopting policy regarding sources of drinking water where exceptions are provided for waters meeting certain criteria.

- The U.S. Environmental Protection Agency promulgated numeric water quality criteria for priority toxic pollutants and other water quality standards provisions to be applied to inland surface waters, enclosed bays and estuaries in California (California Toxics Rule, CTRs).

- A California Stormwater Construction General Permit is required for construction projects disturbing more than 1 acre. The legally responsible person is required to electronically file permit registration documents consisting of a notice of intent, risk assessment, site map, SWPPP, annual fee, and signed certification statement through the State Water Board's Storm Water Multi-Application and Report Tracking System.

ENVIRONMENTAL SETTING (BASELINE):

Groundwater beneath NASNI, which is in hydraulic communication with the saline waters of San Diego Bay and the Pacific Ocean, occurs in the Coronado hydrologic area of the Otay hydrologic unit. The groundwater is saline to brackish, has been exempted as a source of drinking water, and is not considered to be of beneficial use. The water supply for NASNI is supplied by the City of Coronado from the City of San Diego distribution system.

Borings advanced along the top of the bluff in the IR Site 10 SSA encountered groundwater at depths of 8 to 18 feet below ground surface (bgs), at an elevation of approximately 4 feet above mean lower low water (MLLW). Based on tidal influence studies, maximum tidal influence on the water table elevation beneath the IR Site 10 SSA is approximately 0.13 foot.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hydrology and water quality effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance**.**

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The hydrogeological conditions have been characterized through investigations completed as part of the project site investigations. Groundwater samples were also collected and characterized.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Analysis:

The objectives of the proposed remedial actions involve excavating contaminated materials in the SSA. Construction activities during implementation of onsite remedial actions would not violate any water quality standards or water discharge requirements. A site-specific SWPPP would be prepared by a certified Qualified SWPPP Developer and implemented to ensure surface water bodies are not impacted during construction activities. Associated BMPs as part of the SWPPP would be implemented during construction to prevent runoff into surface water bodies.

Conclusion:

The proposed remedial actions are anticipated to improve water quality and groundwater quality and result in the overall reduction of contaminant mass permeating into surface and groundwater systems. Project activities would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. Impacts are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impeded sustainable groundwater management of the basin?

Impact Analysis:

Groundwater would not be extracted as part of implementation of the remedial actions. Groundwater beneath the site would remain isolated. Implementation of the proposed remedial actions would not interfere with the overall recharge of groundwater because the excavation activities would occur in the intertidal zone.

Conclusion:

Implementation of the remedial actions would not interfere with groundwater recharge of groundwater resources. No impact is expected to occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on or off-site;

Impact Analysis:

Excavation activities would not increase any impervious surfaces of the SSA, and the existing storm water controls on the area of the SSA would not be affected by the proposed remediation activities. Any runoff from the SSA would be managed in accordance with all applicable laws and regulations and implementation of the SWPPP would ensure erosion or siltation does not occur on- or offsite during construction activities.

Conclusion:

Implementation of the remedial actions would not result in any changes to onsite drainage patterns because the excavation activities would occur in the intertidal zone. In addition, the proposed remedial actions would not substantially alter the existing drainage pattern of the overall SSA area in a manner which would result in substantial erosion or siltation on- or offsite. Consequently, impacts are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;

Impact Analysis:

Excavation activities would not increase any impervious surface area of the SSA, and the existing storm water controls on the area of the SSA would not be affected by the proposed remediation activities. Any runoff from the SSA would be managed in accordance with all applicable laws and regulations and implementation of the SWPPP would ensure surface runoff would not result in flooding on-or offsite.

Conclusion:

Implementation of the remedial actions would not alter the existing drainage patterns on the proposed project site and would not substantially alter the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Impacts related to flooding are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Impact Analysis:

Excavation activities would not increase any impervious surface area of the SSA, and the existing storm water controls on the area of the SSA would not be affected by the proposed remediation activities. Any runoff from the SSA would be managed in accordance with all applicable laws and regulations and implementation of the SWPPP would ensure runoff water does not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

In addition, requirements of the SWPPP would be followed and associated BMPs would be implemented during remediation activities to ensure activities would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. BMPs can include structural BMPs such as silt fences, sedimentation ponds, erosion control blankets, and temporary or permanent seeding, while non-structural BMPs can include picking up trash and debris, sweeping up nearby sidewalks and streets, maintaining equipment, and training site staff on erosion and sediment control practices.

Conclusion:

Excavation activities and implementation of proposed remedial actions would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(iv) impede or redirect flood flows?

Impact Analysis:

According to the FEMA Flood Map, the proposed project site does not lie within a 100-year flood hazard area. In addition, the proposed remedial actions would not involve building any structures which could impede or redirect flood flows.

Conclusion:

Activities associated with proposed remedial actions would not construct any structures which could impede or redirect flood flows. Therefore, no impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Analysis:

The proposed project site is located in an area at risk from tsunami inundation (CDC 2022). However, remediation activities would occur in the intertidal zone which is flooded daily naturally. The purpose of the remediation activities is to remove hazardous pollutants and prevent future risks of release of hazardous materials.

Conclusion:
Implementation of proposed remedial actions would occur in an area at risk to seiche or from tsunami inundation. However, the remediation activities would occur in the intertidal zone which is naturally flooded on a daily basis. He overall intent of the remediation activities is to remove hazardous pollutants and prevent future risks of release of hazardous materials. Therefore, the project would result in a beneficial impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis:

The objectives of the proposed remedial actions include improving water quality conditions by excavating hazardous materials from the SSA. He removal of the hazardous materials from the intertidal zone would reduce the infiltration of water through contaminated soil and, thus, decrease the potential for contaminants to migrate from soil to groundwater.

Conclusion:

Excavation activities during implementation of site remedial actions would not violate any water quality standards or water discharge requirements identified in any water quality control plan or sustainable groundwater management plan.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Conservation (CDC). 2022. Department of Conservation Tsunami Inundation Map, https://www.conservation.ca.gov/cgs/tsunami/maps. Accessed: February 24, 2022).

11. LAND USE AND PLANNING				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

City of Coronado Zoning Code provides restrictions and regulations on land uses and identifies the proposed project site as a Military Zone. The City of Coronado General Plan designates the land use of the proposed project site as Military Zone.

ENVIRONMENTAL SETTING (BASELINE):

Land use in the vicinity of IR Site 10 is primarily industrial and limited to military-related uses. The NASNI Fuel Farm is located northeast of, and adjacent to, IR Site 10. The IR Site 10 SSA is located along the shoreline of San Diego Bay northwest of Moffett Road, and extends northeast and southwest of Pier E.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of land use and planning resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of land use changes in or near the proposed project site, no environmental studies relating to land use and planning were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Physically divide an established community?

Impact Analysis:

There are no residential areas or developed community on the proposed project site. Implementation of the proposed remedial actions would not physically divide the nearby established community.

Conclusion:

Proposed remedial actions would not have the potential to physically divide an established community based on the distance between the proposed project site and nearest developed community (City of Coronado). No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Analysis:

The proposed remedial actions are intended to be a remedy to previous environmental effects. Implementation of the proposed remedial actions would not conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect but would improve the existing environment.

Conclusion:

The proposed remedial actions would remedy previous environmental effects and would not conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Coronado, 2022. Zoning Information. Available at: https://www.coronado.ca.us/government/departments_divisions/community_development/planning_and_zoning/ (Accessed February 24, 2022).

City of Coronado, 2022. General Plan. Available at: https://www.coronado.ca.us/government/departments_divisions/community_development/planning_and_zoning/ (Accessed February 24, 2022).

12. MINERAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting mineral resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The proposed project site is located in an urban, developed area adjacent to the City of Coronado which has been identified as Urban Land by the California Department of Conservation and has been designated as Military Zone by the City.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of mineral resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of mineral resources in or near the proposed project site, no environmental studies relating to mineral resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Impact Analysis:

The proposed project site is located in an urban, developed area and no known mineral resources of value to the region and the residents of the state exist on the site.

Conclusion:

The cap would not prevent access to potential mineral resources if the proposed project site and surrounding area are ever reclassified. Therefore, no impacts would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Impact Analysis:

The proposed project site is located in an urban, developed area and is not located in an area identified as a mineral resource area.

Conclusion:

The proposed project site is not likely to contain significant mineral deposits and the proposed remedial actions would not prevent access to mineral resources if the proposed project site and surrounding area are ever reclassified. Therefore, no impacts would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

13. NOISE				
Would the project result in:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Noise Plan (Chapter L) of the City of Coronado General Plan discusses the City's goal to improve the overall environment in the City by reducing annoying and physically harmful levels of noise for existing and future residents, and for all land uses. The City adopted noise levels that exceed 60 dBA one-hour average (Leq) to be unacceptable for various land use categories. Leq is the equivalent continuous sound level in decibels, equivalent to the total sound energy measured over a stated period of time (typically one hour).

The City of Coronado Municipal Code (Chapter 41) addresses impacts that are due to construction noise. The noise ordinance states that noise associated with construction activities are exempt from restrictions in the noise ordinance if they occur between 7 a.m. and 7 p.m. of any day or on legal holidays and Sundays (Chapter 41.10.040).

ENVIRONMENTAL SETTING (BASELINE):

The proposed project site is located in an urban, developed area of the City of Coronado and currently zoned as Military Zone. Existing ambient noise in the area of the proposed project site includes military base activities including air and naval activities primarily to the south, east, and west and vehicle trips along nearby roads (e.g., Moffett Road). Existing ambient noise levels in the vicinity of the site are associated with low to moderate traffic from vehicles passing along Moffett Road (approximately 70-80 dBA) and boats in San Diego Bay.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

For purposes of this analysis, noise effects may be considered significant if project activities would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the proposed project site in excess of City noise level standard of 60 dBA Leq or result in generation of excessive ground-borne vibration or ground-borne noise levels.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The Federal Highway Administration (FHWA) developed the Roadway Construction Noise Model (RCNM), which has become the industry-accepted standard model for calculating construction noise levels at specific receptor locations. Model inputs include the type and number of pieces of heavy construction equipment, their usage factors, distance to a receptor, and estimated shielding reduction (if any). The noise modeling for the proposed remedial actions were analyzed according to default construction equipment list from the air quality impact analysis for the Proposed Project. To reflect a conservative analysis, a reasonable worst-case scenario was modeled, assuming that each piece of modeled equipment would operate simultaneously at a reasonable distance from one another at the nearest possible locations to each modeled receptor. The modeled receptor locations represent the closest existing sensitive receptors to the proposed project site.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis:

The proposed project would use heavy equipment for excavation activities in the SSA. Remedial actions would occur over 6 months during daytime hours which meet the City of Coronado's requirement for construction activities (Municipal Code Chapter 41.10.040).

The Proposed Project Site is located approximately 2 miles distance from the nearest noise sensitive receptors (i.e., residences). Using the RCNM, noise levels generated by the loudest construction equipment anticipated to be used for remedial actions (i.e., paver, loader, excavator) at the proposed project site are predicted to be 26 Leq dBA at 8,500 feet (closest distance between the Proposed Project Site and nearest residence) (FHWA 2006). Based on this predicted noise level, temporary noise levels during construction activities are anticipated to be noticed at nearby receptors (e.g., residences) and construction activities would be allowed in accordance with City regulations.

Conclusion:

The Proposed Project would meet City of Coronado's requirement that construction activities shall be concentrated during the hours of the day. In addition, noise levels generated during construction activities would not be discernible from the existing ambient noise levels in the proposed project area because of the distance (8,500 feet) to the nearest noise receptor (e.g., residence). With construction activities occurring only during City of Coronado allowable hours, the proposed project would have a less than significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis:

Implementation of proposed remedial actions would require the use of heavy construction equipment (i.e., paver, loader, excavator) at the proposed project site. Ground-borne vibration and noise generated by the use of these heavy construction equipment would not be felt at the nearest receptor (i.e., residence) because of the extensive distance to construction activities (8,500 feet). Therefore, ground-borne vibration and ground-borne noise levels would not occur at levels that would be considered excessive because distance and ground would substantially attenuate vibration and noise.

Conclusion:

Construction equipment used during proposed remedial actions would not generate excessive ground-borne vibration or noise felt at the nearest receptor. A less-than-significant impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis:

The Proposed Project Site is located within the boundaries of the Naval Air Station North Island (NASNI). However, the proposed excavation activities would not create excessive noise levels at any noise-sensitive receptors.

Conclusion:
The proposed remedial actions would occur within the boundaries of the NASNI and the proposed remedial actions would not the potential to expose people residing or working in the project area to excessive noise levels generated by a nearby airport or airfield. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

14. POPULATION AND HOUSING				
Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting population and housing resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

City of Coronado Zoning Code provides restrictions and regulations on land uses and identifies the proposed project site as a Military Zone. The City of Coronado General Plan designates the land use of the proposed project site and immediate surrounding areas as Military Zone.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of population and housing resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of housing on the proposed project site, no environmental studies relating to population and housing resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Induce substantial unplanned population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact Analysis:

Implementation of the proposed remedial actions are intended to clean up contaminated soils in the intertidal zone. As a result, remediation of contaminated soils would not result in the allowance for increased population growth, such as new residential uses.

Conclusion:

The proposed project would not have the potential to allow for future population growth. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact Analysis:
Implementation of the proposed remedial actions are intended to clean up contaminated soils at the proposed project site. Remediation of contaminated soils would not require removing any existing people or housing.

Conclusion:
The proposed project would not have the potential to displace substantial numbers of existing people or housing.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

15. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental 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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting public services resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

City of Coronado Zoning Code provides restrictions and regulations on land uses and identifies the proposed project site as a Military Zone. The City of Coronado General Plan designates the land use of the proposed project site and immediately surrounding area as a Military Zone.

Public parks located within proximity of the Proposed Project Site includes Coronado Tidelands Park (located 3 miles to the southeast). Coronado elementary, middle, and high school is located approximately 2 miles to the southeast of the site. Coronado Police Department is located 2 miles to the southeast of the Site. Coronado Fire Department is also located 2 miles to the southeast and Sharp Coronado Hospital is located 3 miles to the southeast of the site. Lastly, the Coronado Public Library is located 2 miles to the southeast of the site.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of public services resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact of the proposed project site to public services resources, no environmental studies relating to public services resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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:

i. Fire protection?

Impact Analysis:

The closest fire station to the proposed project site is the Coronado Fire Department located at 1001 6th Street in Coronado. The drive distance between the proposed project site and the fire station is 4 miles. Potential demands on fire protection services may increase slightly during the construction period as a result of unforeseen events related to the scope of work. However, ongoing adherence to procedures and practices identified in the proposed project's HASP would reduce the potential for incidents to occur that would require a fire district response.

Conclusion:

Ongoing adherence to procedures and practices identified in the proposed project's HASP would reduce the potential for incidents to occur that would require response from fire protection services. After completion of remedial actions, the proposed project would not cause an increase in demand on fire protection, as compared to the current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

ii. Police protection?

Impact Analysis:

The proposed project site is located in the jurisdiction of the City of Coronado's Police Department. Potential demands on law enforcement or emergency response services could increase slightly during the construction period as a result of unforeseen events or circumstances. However, risks to human health and safety would be minimized through ongoing adherence to procedures and practices identified in the proposed project's HASP.

Conclusion:

Ongoing adherence to procedures and practices identified in the proposed project's HASP would reduce the need for police protection services. After completion of remedial actions, the project would not cause an increase in demand on police protection, as compared to current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iii. Schools?

Impact Analysis:

The closest schools to the proposed project site include the Coronado elementary, middle, and high school which is located approximately 2 miles to the southeast. The proposed project would not result in an increase in population or associated increase in demand on these schools.

Conclusion:

Remedial activities would not create a demand for existing or new school facilities. No impact to school facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

iv. Parks?

Impact Analysis:

The nearest neighborhood park to the site include the Coronado Tidelands Park (located 3 miles to the southeast). The proposed project would not result in an increase in population or associated increase in demand on parks.

Conclusion:

Remedial activities would not create a demand for existing or new park facilities. No impact to park facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

v. Other public facilities?

Impact Analysis:

The closest hospital to the proposed project site is the Sharp Coronado Hospital located approximately 3 miles to the southeast at 250 Prospect Place in Coronado. Construction activities could result in a slight increase in demands for services at the medical center. The potential for incidents requiring medical attention would be minimized through adherence with the proposed project's HASP.

Conclusion:

Ongoing adherence to procedures and practices identified in the proposed project's HASP would reduce the need for other public facilities and services. After remedial actions complete, the project would not cause an increase in demand on other public facilities and services, as compared to current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

16. RECREATION				
	Potentially Significant Impact	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting recreational resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

Public parks located near the proposed project site includes Coronado Tidelands Park (located 3 miles to the southeast). Coronado Tidelands Park is located in the City of Coronado and provides amenities including picnic areas, a playground, softball diamonds, and a skatepark.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of recreational resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of impacts to recreational resources in or near the proposed project site, no environmental studies relating to recreational resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact Analysis:

The nearest neighborhood park is Coronado Tidelands Park located 3 miles southeast of the proposed project site in a residential district. Implementation of proposed remedial actions would not directly increase the permanent resident population in the area because no habitable structures are planned as part of the project.

Conclusion:

The proposed project would not increase the use of existing neighborhood and regional parks, other recreational parks, or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. No impact to the use of existing neighborhood and regional parks or other recreational facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

b. Does the project include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact Analysis:

The proposed project site does not contain any existing recreational facilities. Implementation of proposed remedial actions would not involve or require construction of any recreational facilities.

Conclusion:

The proposed project would not construct or cause the need for construction of additional recreational facilities. No impact to existing or need for additional recreational facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

17. TRANSPORTATION				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal laws and regulations

Resource Conservation and Recovery Act (RCRA) Title 42 United States Code Subtitle C and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, transporters of hazardous waste are governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste.

The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations

Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste.

California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

Local laws and regulations

Federal Highway Administration 23 CFR 450.322 requires that each transportation management area (TMA) address congestion management through a process involving an analysis of multimodal metropolitan wide strategies that are cooperatively developed to foster safety and integrated management of new and existing transportation facilities eligible for federal funding. The San Diego Association of Governments (SANDAG) has been designated as the TMA for the San Diego region.

San Diego Forward: The 2019 Federal Regional Transportation Plan, the region's long-range transportation plan and Sustainable Communities Strategy, meets the requirements of 23 CFR 450.322 by incorporating the following federal congestion management process (CMP): performance monitoring and measurement of the regional transportation system, multimodal alternatives and non-SOV analysis, land use impact analysis, the provision of congestion management tools, and integration with the Regional Transportation Improvement Program (RTIP) process.

ENVIRONMENTAL SETTING (BASELINE):

Moffett Road provides the main access route to the proposed project site. Tow Way and McCain Boulevard provide the main access into the NASNI.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of transportation resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance. LOS has been the standard by which transportation impacts of major developments and changes to roads were measured. LOS was formally defined in the 1965 Highway Capacity Manual as a "qualitative measure of the effect of a number of factors, which include speed and travel time, traffic interruptions, freedom to maneuver, safety, driving comfort and convenience, and operating cost". It is better understood today that LOS does not accurately reflect vehicle travel as it only focuses on individual local intersections and roadway segments and not on the entire vehicle trip. In 2013, the State of California passed Senate Bill (SB) 743 which required the Office Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. LOS was replaced with Vehicle Miles Traveled (VMT) as "the most appropriate metric of a project's potential transportation impacts". VMT data are used primarily by transportation agencies, environmental agencies, and consultants to perform a variety of functions such as allocating resources, estimating vehicle emissions, computing energy consumption, and assessing traffic impacts.

Section 15064.3(b) of the CEQA Guidelines states the following:

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact to transportation resources in or near the proposed project site, no environmental studies relating to transportation resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Impact Analysis:

The proposed remedial actions would not affect public roadways in the long-term because these activities would not substantially affect the overall circulation system. The proposed project would add some traffic to

roadways during the 6-month construction period due to delivery of materials and supplies to the SSA, removal of wastes from the SSA, and workers traveling to and from the SSA. The proposed project would not have any long-term effects on congestion levels.

During construction, periodic movement of heavy equipment would occur using Moffett Road along with Tow Road and/or McCain Boulevard. It is anticipated that approximately 332 heavy haul truck trips will be required for transporting approximately 5,650 cubic yards (cy) of wastes for off-site landfill disposal. These truck trips would occur over the 6-month construction period resulting in an average of 3 truck trips per day (26 weeks x 5 days per week / 332 truck trips). After excavation, backfilling of approximately 8,800 cy of clean soil would be required to restore the site and bring it to final line and grade. Soil used for backfilling would be transported from offsite and, therefore, would require approximately 518 additional truck trips (8,800 cy soil / 17 cy per truck). Truck trips for backfill would also over a period of 6 months (which would equate to approximately 4 truck trips per day).

The trucks would primarily enter and exit the proposed project site at Moffett Road. Haul truck routes through the City of Coronado would involve the use of either 3rd and 4th Streets to/from the Coronado Bridge, 3rd and 4th Streets to/from Orange Avenue to/from Silver Strand Boulevard, or Ocean Boulevard to/from Silver Strand Boulevard. As these trips would be intermittent, the remedial actions would not substantially increase the traffic on any public street system.

Excavation, truck loading, and off-base transport activities would be coordinated and implemented in stages at specific areas to minimize potential impacts to existing base operations and traffic, as well as to communities along the off-site transport route. Trucks hauling the containerized wastes off site would be covered with tarps, and load weight and height will be limited. Truck traffic would also be limited to off-peak hours. Emergency spill containment and cleanup contingency planning would be implemented to minimize potential exposure from an accidental spillage. Lastly, prior to entering the SSA, all haulers would demonstrate that their vehicles are properly registered, operational, and placarded in compliance with Federal, State and Local laws, for the type of material being transported. With implementation of these traffic management actions, the proposed project is considered to result in a less-than-significant impact in relation to congestion management. In addition, the temporary increase in truck traffic during implementation of remedial actions would not affect any program, plan, ordinance or policy relating to these transportation facilities.

Conclusion:

The proposed project would not incorporate any activities, short-term or long-term, that would have the ability to conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities in the project area.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis:

Vehicle miles traveled (VMT) is a measure used in transportation planning for a variety of purposes. It measures the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. VMT is calculated by adding all the miles driven by all the cars and trucks on all the roadways in a region. This metric plays an integral role in the transportation planning, policy-making, and revenue estimation processes due to its ability to indicate travel demand and behavior. VMT may also be used to evaluate conformity assumptions, adjust travel demand forecasts, and identify pavement maintenance needs. Implementation of proposed remedial actions would not generate additional long-term vehicle trips or change circulation patterns in the project area.

Conclusion:

The proposed remedial actions would not increase long-term vehicle miles traveled levels from/to the proposed project site consistent with Section 15064.3(b) of the CEQA Guidelines. There would be no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Analysis:

The proposed project involves onsite remedial actions to address soil contamination. The proposed remedial actions would not contain a design feature or incompatible use that would substantially increase traffic hazards because the activities would not alter the public roadways system. The majority of intersections in the NASNI and in the City of Coronado are light controlled for safe traffic movements to/from the proposed project site and this condition would not change.

Conclusion:

Implementation of the remedial actions would not include any design features or incompatible uses which would substantially increase hazards. No impacts related to increased hazards due to a geometric design feature or incompatible uses would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Result in inadequate emergency access?

Impact Analysis:

The proposed remedial actions would not affect emergency access to/from the proposed project site in the long-term because these activities would not substantially change the overall circulation system on- and offsite. In addition, all construction equipment would be located and stored onsite and would not have the potential to block access roads.

Conclusion:

Emergency access to/from the proposed project site would not change with implementation of remedial actions. No impacts related to inadequate emergency access would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

18. TRIBAL CULTURAL RESOURCES				
Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Tribal cultural resources are defined in PRC Div. 13 Section 21074. California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe (PRC 21081.3.1).

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

There are no known tribal cultural resources, as defined in PRC Div. 13 Section 21074, on the Proposed Project Site or in its immediate vicinity. There are numerous archaeological Sites within San Diego County that have been recorded with the Archaeological Inventory Report, Northwest Information Center (NWIC) at California State University Sonoma. However, the proposed project site is in a largely urbanized area (i.e., military airbase) excluded from the archeological sensitivity survey.

DTSC complied with the 2014 Assembly Bill 52 (AB52). DTSC provided written notification to seven tribes on the Tribal Consultation List from the NAHC regarding the Proposed Project on October 5, 2021. The notice included a brief project description, project location, and lead agency's contact information. DTSC did not receive interest from any Tribal governments.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Tribal cultural resources are defined as either 1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or listed in a local register of historical resources or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, is a tribal cultural resource (OPR, 2017).

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the unlikely potential for unknown cultural resources to be located on the proposed project site, no environmental studies relating to cultural resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Impact Analysis:

There are no known tribal cultural resources, as defined in PRC Section 21074, on the proposed project site or in its immediate vicinity. As described in the Baseline Environmental Conditions, the proposed project site is in a largely urbanized area (i.e., military airbase). Based on the proposed project site location, history, and absence of cultural resource findings during prior site work, it is not likely that historical resources would be identified or impacted during remedial actions. However, if tribal cultural resources are discovered during remedial actions, work would stop in that area until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC and other agencies and Native American representatives, as appropriate.

Specifically, in the event of discovery of human remains during ground-disturbing activities, work within 25 feet of the discovery shall stop immediately and the County Coroner shall be notified to determine its origin. The County Coroner would determine disposition within 48 hours. If the remains are Native American, the County Coroner would be responsible for contacting the NAHC within 24 hours. The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

In the event of discovery of potential cultural or archaeological resources, excavation activities would be immediately suspended in the immediate area and surrounding 25 feet along with contacting and informing the DTSC Project Manager [Daniel Cordero at (714) 484-5428; daniel.cordero@dtsc.ca.gov]. After discussion with their Tribal Chairperson or respective Cultural Resources Managers or Tribal Historic Preservation Officers and in collaboration with DTSC (including the Office of Environmental Equity) and the property owner, any measures deemed necessary to record and/or protect the cultural or archaeological resource(s) would be implemented.

Conclusion:

The proposed project would not include the demolition, elimination, or manipulation of a known tribal cultural resource. In addition, the finding of an unknown tribal cultural resource during implementation of remedial actions is unlikely based on the site history and conditions and absence of findings during prior onsite work. However, the proposed project includes measures that would be implemented if discovery of unknown tribal cultural resource were uncovered during remedial actions. The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource and impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis:

There are no known tribal cultural resources, as defined in PRC Section 21074, on the proposed project site or in its immediate vicinity. The proposed project site is in a largely urbanized area (i.e., military airbase).

In 2017, DTSC held a meeting for Tribal Authorities requesting information about all projects that were progressing at NASNI. As part of identifying cultural and/or archaeological resources on military property, the military first evaluates a site with their cultural/archeological resources personnel. If cultural or archeological resources are not found, no notification to the Tribal Authorities is conducted. If cultural or archeological resources are identified, the military then contacts the identified Tribal Authorities. No cultural or archeological resources have been identified at NASNI Site 10. The inter-tidal area (project site) was created by the military with dredge fill in the 1930s and expanded in subsequent years.

Based on the SSA location, history, and absence of cultural resource findings, it is not likely that historical resources would be identified or impacted during remedial actions. However, the proposed project includes a standard operating procedure whereby all possible damages caused in the event of an unanticipated discovery can be avoided. Specifically, if tribal cultural resources are discovered during remedial actions, work would stop in that area until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC and other agencies and Native American representatives, as appropriate. As previously stated, the proposed project site is located in the intertidal zone and no information regarding the presence of known tribal cultural resources has been provided to the DTSC from the contacted tribes or from cultural resource surveys or records.

Conclusion:

As no known tribal cultural resources occur at the proposed project site or would be affected by the proposed project, and implementation of the contingency set forth in Section 18 (a)(i) would reduce impacts to unknown tribal cultural resources during excavation activities, impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Governor's Office of Planning and Research (OPR). 2017. Technical Advisory, AB52 and Tribal Cultural Resources in CEQA. June 2017.

19. UTILITIES AND SERVICE SYSTEMS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting utilities and service systems resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

No utilities are required to conduct the NTCRA at the SSA.

The California American Water Company – Coronado District (Cal-Am Water – Coronado), provides water for about 94,000 residents living in the area of Coronado. Established in 1886, the Cal-Am Water - Coronado currently obtains its supply via purchase from the City of San Diego, which uses surface water supplies from local reservoirs and the San Diego County Water Authority via the Metropolitan Water District of Southern California (MWD) and transfers from other water agencies. MWD has two main sources: the Colorado River and the Sacramento River Delta.

The City of Coronado Wastewater Division is responsible for the maintenance of 17 sewer pump stations and more than 45 miles of underground sewer pipe line. On average, Coronado transfers 2.35 million gallons per day of sewage, including sewage from the Cays and all Navy bases, to the City of San Diego's Point Loma Treatment Plant.

EDCO provides refuse and recycling service in the City of Coronado. Waste is then disposed at numerous landfills located throughout San Diego County.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of utilities and service systems resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to utilities and service systems resources in or near the proposed project site, no environmental studies relating to utilities and service systems resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?

Impact Analysis:
The proposed remedial actions would not create the need for or result in the construction of new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities. The proposed project would be conducted in the intertidal zone of the SSA. This project involves excavation of contaminated soils and would not include construction or expansion of storm water drainage facilities.

Conclusion:

Activities associated with the proposed project would not require new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities. Impacts to these facilities would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact Analysis:

Implementation of remedial actions would require approximately six months to complete. The primary source of water, if needed during construction activities, would be supplied by the existing onsite non-potable fire protection water system. If needed, additional water would be transported to the proposed project site by water trucks.

Conclusion:

Sufficient water supplies from existing entitlements and resources onsite are available to serve the needs of remedial actions during the anticipated 6-month construction period. The remedial actions would not create long-term, future demand for water supply beyond existing conditions. Impacts to water supplies would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Analysis:

Implementation of remedial actions would not generate wastewater that would require a wastewater treatment provider. Wastewater generated during equipment decontamination activities would be containerized, profiled, and disposed at an appropriate offsite facility.

Conclusion:

Construction activities associated with remediation of the proposed project site would not create a demand for wastewater treatment at any wastewater treatment provider. No impact to a wastewater treatment provider would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact Analysis:

Solid waste associated with remedial actions would comprise of approximately 5,650 cubic yards of contaminated soil. Contaminated soil would be transported to an appropriate facility for disposal based on final waste characterization results. Facilities considered for disposal of contaminated soil include:

- Clean Harbors Landfill in Buttonwillow, California; or
- US Ecology Landfill in Beatty, Nevada;

Each of these facilities have sufficient permitted capacity to receive the anticipated 5,650 cubic yards of contaminated soil; however, the capacity to accept would be confirmed in advance of transport to a facility.

Conclusion:

Solid waste generated by remedial actions would be served by a landfill with sufficient permitted capacity to accept the contaminated soil. A less-than-significant impact would occur to solid waste facilities.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Analysis:

Implementation of remedial actions would generate approximately 5,650 cubic yards of contaminated soil. Disposal of contaminated soil would comply with all federal, state, and local statues and regulations related to solid waste including, but not limited to: characterization, storage, labeling, transport, and disposal.

Conclusion:

Disposal of contaminated soil would comply with all federal, state, and local statues and regulations related to solid waste. Therefore, no impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

20. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting wildfire resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

State Responsibility Areas are boundaries adopted by the Board of Forestry and Fire Protection and are areas where the California Department of Forestry and Fire (CAL FIRE) has a financial responsibility for fire suppression and prevention. Review of the California State Responsibility Area Viewer indicate the proposed project site is not located in a Very High Hazard Severity Zone (VHFHSZ) but is located in a Federal Responsibility Area. The closest area classified as a VHFHSZ is located 2 miles northwest of the proposed project site (CAL FIRE 2007).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of wildfires resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to wildfire resources in or near the proposed project site, no environmental studies relating to wildfire resources were prepared for the proposed project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

Please refer to the analysis provided in Section 9(f) of this Initial Study.

Conclusion:

Please refer to the conclusion provided in Section 9(f) of this Initial Study.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact Analysis:

The proposed project site is not located in an area with environmental conditions conducive to wildland fires. The project site is in an urban area lacking dry vegetation. However, operation of construction equipment during remedial actions has the limited potential to spark a fire. However, construction activities would implement BMPs which address fire prevention methods such as:

- restricting vehicles from driving or parking on dry vegetation during fire sensitive times of the year; and
- wetting dry construction areas before commencing activities, and wetting throughout the day, as appropriate.

Conclusion:

Although construction equipment has a minimal potential to spark a fire during remedial actions, implementation of BMPs would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the remedial actions are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact Analysis:

Implementation of remedial actions would not require the installation or maintenance of associated infrastructure (e.g., fuel breaks, emergency water sources, power lines, other utilities) that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. The remedial actions may require construction of temporary access roads of compacted clean soil or imported clean gravel to facilitate access to work areas. However, the temporary access roads would overall reduce wildfire risk during the implementation of remedial actions by incorporating soil or gravel.

Conclusion:

The proposed remedial actions would not install any infrastructure that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact Analysis:

Landslides tend to occur where slopes are steeper with higher relief. The proposed project site is flat with very little relief. The proposed remedial actions would not significantly change the existing slope of the proposed project site.

Conclusion:

The proposed remedial actions would not create steep slopes or disturb any landslide-prone areas. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Forestry and Fire (CAL FIRE), 2007. Contra Costa County Fire Hazard Severity Zone Maps for State Responsibility Area. November. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/ (Accessed April 28, 2021).

21. MANDATORY FINDINGS OF SIGNIFICANCE

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. The project does not have impacts that are individually limited but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

c. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5
Reference: Public Resources Code Sections 21094.5 and 21094.5.5