



San Diego Unified Port District
P.O. Box 120488
San Diego, California 92112-0488

NOTICE OF PREPARATION
of a
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT TITLE: BAE SYSTEMS WATERFRONT IMPROVEMENT PROJECT (UPD #EIR-2018-197)

APPLICANT: BAE Systems San Diego Ship Repair Inc.

LOCATION: 2205 East Belt Street, City of San Diego, in San Diego County, California

REFERENCE: California Code of Regulations, Title 14, Sections 15082(a), 15103, 15375

The San Diego Unified Port District (District) will be the Lead Agency in preparing an Environmental Impact Report (EIR) for the project identified above (proposed project or project). The District is soliciting input and feedback from various agencies, stakeholders, and the public pertaining to the scope and content of the environmental information that will be included in the EIR. For certain agencies, this may be germane to statutory responsibilities in connection with the proposed project. An agency may need to use the proposed project's EIR when considering its permit or other approval for the project. The project description, location, and possible environmental effects of the proposed project are contained in the attached materials.

Due to the time limits mandated by state law, your comments must be sent at the earliest possible date but no later than 30 days after issuance of this notice. **Comments regarding environmental concerns will be accepted until 5:00 p.m. on Monday, April 8, 2019**, and should be mailed to: San Diego Unified Port District, Development Services Department, Attn: Joseph Smith, Department Manager, P.O. Box 120488, San Diego, CA 92112-0488 or emailed to: jdsmith@portofsandiego.org.

A public scoping meeting regarding the proposed EIR will be held on Monday, March 25, 2019 at 5:00 p.m. at the San Diego Unified Port District Administration Building, Training Room, 3165 Pacific Highway, San Diego, CA 92101.

For questions on this Notice of Preparation, please contact Joseph Smith, Department Manager, at (619) 686-6597.

Signature: *Wileen C. Manaois*

Wileen C. Manaois
Director, Development Services

Date: *March 5, 2019*

Issuance Date: March 7, 2019

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San Diego Unified Port District
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NOTICE OF PREPARATION
of a
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
BAE SYSTEMS WATERFRONT IMPROVEMENT PROJECT
(UPD #EIR-2018-197)

Publication of this Notice of Preparation (NOP) initiates the San Diego Unified Port District's (District's) compliance with the California Environmental Quality Act (CEQA) for the BAE Systems Waterfront Improvement Project (proposed project or project). The NOP is the first step in the Environmental Impact Report (EIR) process. It describes the proposed project and is distributed to responsible agencies, trustee agencies, cooperating federal agencies, and the general public. As stated in State CEQA Guidelines Section 15375, the purpose of the NOP is "to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR." The District is the CEQA lead agency and the Project Applicant/Proponent is BAE Systems San Diego Ship Repair Inc. (BAE Systems or Applicant).

Project Location

The project site is located in San Diego, California, at the BAE Systems San Diego Ship Repair Yard at 2205 E. Belt Street, within Planning Subarea 43 (Belt Street Industrial) of Planning District 4 (Tenth Avenue Marine Terminal) of the certified Port Master Plan. Existing facilities at the project site include three working piers, five wet berths, and two floating drydocks, all of which are used to modernize, repair, and overhaul marine vessels. The site is bounded by East Belt Street and marine-related industrial uses to the north and east, R.E. Staite Engineering to the northwest, NASSCO/General Dynamics ship building facility to the southeast and south, and San Diego Bay to the west. Per the Port Master Plan, the area surrounding the project site is developed entirely with marine-related industrial businesses, while the waterside portion of the site is surrounded entirely by specialized berthing water uses.

Major regional circulation facilities in the area include State Route (SR-) 75, also known as the San Diego-Coronado Bay Bridge, approximately 0.25 mile to the northwest, and Interstate (I-) 5, approximately 0.5 mile to the northeast. Figure 1 provides a regional map of the proposed project's location. Figure 2 provides an aerial view of the proposed project site.

Project Description

BAE Systems is a ship repair company in the San Diego area, primarily serving non-nuclear Navy vessels, as well as commercial customers. The purpose of the proposed project is to maintain and improve existing facilities at the BAE Systems San Diego Ship Repair Yard for the berthing needs of current and future U.S. Naval assets and other customers. As part of the U.S. Navy's "Pivot West" strategy, it is anticipated that more Navy vessels will be home-ported in San Diego. As a result, BAE Systems requires the ability to flexibly locate various ships within the existing facility as well as to ensure safe and efficient facility utilization for the moorage of vessels, including during extreme weather conditions. However, no new berthing space would be provided with the proposed project and no increase in the number of vessels serviced would result.

Notice of Preparation

The proposed project would replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations at the ship repair yard. While these improvements would allow for newer and different classes of vessels to be moored and repaired on site, the proposed improvements are not expected to increase the number of vessels serviced as no new berthing space would be provided and the mooring of new, larger vessels would reduce the number of other vessels that could be concurrently moored at the ship repair yard. The proposed project includes 15 distinct project elements designed to improve efficiency and functionality of the existing BAE Systems San Diego Ship Repair Yard. A summary of the proposed activities associated with each project element is provided in Table NOP-1. Figure 3 provides an overall site plan identifying the location of each project element by number and Figures 4 through 11 provide representative photos of the various project elements.

Table NOP-1. Proposed Project Elements

#	Title	Description
1	Pride of San Diego Drydock Dredging and Moorage Replacement	This project element proposes to shift the Pride of San Diego drydock west by approximately 100 feet and replace two existing 15 by 30-foot mooring dolphins (which would include removing twenty-six 18-inch square concrete piles and 85 cubic yards [cy] of concrete caps, installation of thirty-eight 24-inch octagonal precast concrete piles and 900 square feet of surface area). The drydock sump would be relocated, which would require dredging to -70 feet of overdepth and transportation of 24 scows offsite.
2	Pride of San Diego Drydock Wharf Replacement and Realignment	Upon completion of Project Element 1, wharf and ramp modifications would be needed. This project element proposes to extend the Pride of San Diego wharf to provide a material handling area. This element would include demolition of approximately 5,540 square feet of the existing wharf and twenty 18-inch piles, and installation of 12,500 square feet of cast-in-place decking on 73 octagonal piles and 6 concrete precast piles to extend the wharf structure to the northeast. An apron and a new pedestrian access ramp would be installed to minimize in-water structures required to access and support the drydock. The replacement structure would be incorporated into the existing Pride of San Diego wharf ramp; however, if the geotechnical evaluation determines this to be technically infeasible, the existing structure would be demolished and a complete replacement would be constructed (this worst case scenario is assumed for analysis purposes).
3	Fender Repair and Replacement	Fenders are occasionally damaged when impacted by vessels and need to be replaced to provide safe vessel moorage. This project element proposes to remove and replace 503 existing (14-inch by 89-foot) steel H-pile fenders, and install an additional 122 new steel H-pile fenders for a total of 625 fenders. Due to the occasional damage to fenders the project assumed that approximately 39 steel H-pile fenders would be replaced per year.
4	Pier 3 South Nearshore Dredging	This project element proposes to dredge approximately 15,000 cubic yards from the toes of the dredge sump to allow for the safe passage of tug boats while maneuvering large ships. The dredged materials would be placed directly onto dredge scows and disposed off tidelands at an upland disposal site.
5	Pier 3 Mooring Dolphin	This project element proposes the installation of one 16- by 20-foot, 3-foot thick mooring dolphin 970 feet offshore (west) of the U.S. Bulkhead Line. The dolphin would provide a fixed mooring structure to secure the bow of large vessels and would require the installation of eight 24-inch concrete octagonal piles, two 150-ton double bits, and 16 steel H-pile fenders, 12 cylindrical fenders, whalers, and chocks around the perimeter of the proposed mooring dolphin. This project element is necessary to ensure safe vessel moorage, especially during extreme storm surge or other climatic conditions (e.g., wind and tide).

Table NOP-1. Proposed Project Elements

#	Title	Description
6	Pier 3 North Lunchroom Wharf Replacement and Realignment	This project element proposes demolition of the existing overwater 1,150-square-foot restroom structure, as well as removing the existing 2,915-square-foot wood decking, 595 square feet of metal material, and twenty-seven 12-inch concrete pilings and one HP-pile. This project element proposes to install forty-eight 24-inch octagonal pre-cast concrete pilings; and 8,800 square feet of cast-in-place decking.
7	Quay Wall Modifications	This project element proposes to dredge 300 cy of rock and 500 cy of sediment in the immediate vicinity of the submerged sheet pile structure, and installation of up to 50 linear feet of submerged sheet pile structure.
8	Port Security Barrier Replacement	A Port Security Barrier (PSB) is maintained around the existing shipyard facility as required by the U.S. Navy for vessels located within the BAE Systems San Diego Ship Repair Yard. The U.S. Navy has instituted new, stricter requirements for the PSB system, resulting in the need for BAE Systems to replace the existing PSB with a new design. This project element proposes the removal of the existing PSB consisting of a 3,500-linear-foot floating boom and replacing it with a new 3,500-foot hard barrier. The project element would also replace the weighted anchors that hold the existing PSB system in place (consisting of 30 anchors and 60 sinker weights).
9	Small Boat Mooring Float Replacement	This project element is to address enhanced site security requirements instituted by the U.S. Navy that requires BAE Systems to maintain on-water security, including a security patrol vessel. This project element would involve the replacement of the existing 320-square-foot (160 square feet for each float) aged timber moorage float system with two 200-square-foot concrete floats. The new floats would include one 45-foot-long aluminum gangway, low voltage electrical service, and potable water. This project element also proposes to replace four piles supporting the float.
10	Central Tool Room Demolition and Reconstruction	This project element includes the demolition of the existing 2,000-square-foot central tool room and the construction of a new 21,900-square-foot, 3-story tool room on the wharf (part of Project Element 6). This project element also includes replacing the existing Pier 3 restroom facilities.
11	New Production Building	This project element proposes to demolish the existing 17,675-square-foot production building and construct a new 3-story, 48,379-square-foot (16,475-square-foot building footprint) production building to increase the efficiency of material assembly. An overhead bridge crane would be installed within the first floor of the new building.
12	Administration Office Building	This project element includes removal of four existing trailers and construction of a new permanent 3-story modular administrative office space with approximately 46,000 square feet of work space, a building footprint of 16,000 square feet, and a height of up to 55 feet. The first floor would contain production spaces, a tool room, and restroom. The second and third floors would contain office space and a second-floor break room.
13	Pier 1 Restroom Renovation and/or Demolition	The restroom facility would be reconfigured to increase the number of fixtures and upgraded to provide water efficient fixtures, LED lighting, and other features to increase utility and efficiency. However, upon completion of Project Element 12 (Administration Office Building), the Pier 1 restroom may be demolished.
14	Main Electrical Utility Service Update	This project element proposes to relocate the existing San Diego Gas & Electric (SDG&E) main in Building 13 to Building 65 alongside East Belt Street and to replace and upgrade electrical distribution equipment. This project element would increase overall site safety by allowing SDG&E

Table NOP-1. Proposed Project Elements

#	Title	Description
		technicians access to critical electrical components outside the secure property perimeter.
15	Sanitary Sewer and Potable Water Utilities Services	The existing sanitary sewer and potable water service feeds were installed in 1983. This project element proposes to replace the sanitary and potable water feeds to better accommodate the existing hotel service requirements of modern naval and commercial vessels.

The majority of the proposed work would take place within the District’s jurisdiction (i.e., Project Elements 2, 3, 4, and 6, 7, and 9–15). Three project elements are located either partially (Project Elements 1 and 8) or entirely (Project Element 5) within State Lands Commission (SLC) jurisdiction and are outside of the District’s jurisdiction. BAE Systems will apply directly to SLC and the California Coastal Commission (CCC) for authorization and entitlements for Project Elements 1, 5, and 8; however, this Initial Study and corresponding Draft Environmental Impact Report (EIR) will analyze the entire proposed project as required by the California Environmental Quality Act (CEQA).

Project Construction

Construction of the various project elements is anticipated to begin in February 2020 with Project Element 3 (Fender System Repair and Replacement) and Project Element 4 (Pier 3 South Nearshore Dredging) and last through December 2024. Construction of each project element would not be performed sequentially as numbered on Figure 3, and construction of several elements may occur concurrently. Construction activities would occur between 7 a.m. and 7 p.m. in compliance with the City of San Diego Noise Ordinance (Municipal Code Section 59.5.0404).¹ However, dredging operations would occur 24 hours a day, 7 days per week for the duration of dredging activities. Table NOP-2 lists the project elements in chronological order and provides the anticipated timing, duration, and construction crew size of each project element.

Table NOP-2. Proposed Construction Schedule

#	Project Element	Schedule	Duration (months)	Crew Size
3 ^a	Fender System Repair and Replacement (continuous)	February 2020–October 2020	9.00	6
4	Pier 3 South Nearshore Dredging	February 2020–April 2020	2.25	10
5	Pier 3 Mooring Dolphin	March 2020–April 2020	1.50	5
9	Small Boat Mooring Float Replacement	July 2020–August 2020	1.00	5
7	Quay Wall Modifications	October 2020–November 2020	1.00	10
14	Electric Utility Service Update	January 2021–April 2021	3.50	5
8	Post Security Barrier Replacement	February 2021–April 2021	2.00	6
6	Pier 3 Lunchroom Wharf Replacement and Realignment	July 2021–October 2021	3.50	7

¹ When the District has not adopted its own code or regulation on a specific topic, it defers to the corresponding member city’s codes and regulations for the same.

Table NOP-2. Proposed Construction Schedule

#	Project Element	Schedule	Duration (months)	Crew Size
1	Pride of San Diego Drydock Dredging and Moorage	February 2022–May 2022	3.25	12
2	Pride of San Diego Drydock Wharf Replacement and Realignment	February 2022–May 2022	4.00	13
15	Sanitary Sewer and Potable Water Utility Services	July 2022–September 2022	3.00	3
11	New Production Building	October 2022–July 2023	9.25	16
12	Administration Office Building	August 2023–May 2024	9.50	16
13	Pier 1 Restroom Renovation and/or Demolition	March 2024–April 2024	1.00	10
10	Central Tool Room Demolition and Reconstruction	June 2024–December 2024	7.00	13

Note: The project construction schedule has been structured to minimize in-water work during the California Least Tern nesting/foraging season, where feasible.

^a Fender system repairs and new installation to be conducted at various berths and quay walls depending on BAE Pier availability. Schedule for this project element reflects the duration if all berths were replaced/installed continuously.

Project Operations

Several of the proposed project elements are infrastructure maintenance and modernization improvements and would not change the existing operations at the project site. However, Project Element 1 (Pride of San Diego Drydock Dredging and Moorage), as well as Project Element 4 (Pier 3 South Nearshore Dredging) and Project Element 5 (Pier 3 Mooring Dolphin), would allow BAE Systems to improve operational efficiency. However, as stated above, the proposed improvements are not expected to increase the number of vessels serviced as no new berthing space would be provided and the mooring of new, larger vessels would reduce the number of other vessels that could be concurrently moored at the ship repair yard. The Pier 3 improvements would allow for servicing of newer and different classes of vessels, which would represent a change from existing conditions. Therefore, the analysis contained within the Draft EIR will evaluate how any changes to operations, including the result of more efficient systems, will affect the environment.

Environmental Considerations

The Draft EIR will address the following potential project-related and cumulative environmental effects of the proposed project, including: Air Quality, Biological Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation/Traffic, and Utilities and Service Systems. The Draft EIR will also address other potential impacts identified during the NOP process, identify feasible mitigation measures and a reasonable range of alternatives, and include the other additional mandatory sections required by CEQA. A proposed Mitigation Monitoring and Reporting Program (MMRP) to address the potentially significant adverse impacts of the proposed project will also be presented to the Board of Port Commissioners for its consideration. The Initial Study/Environmental Checklist is attached.

Comments

This NOP is available for a 30-day public review period that starts on Thursday March 7, and ends at 5:00 p.m. on Monday, April 8, 2019. Comments regarding the scope and content of the environmental information that should be included in the Draft EIR and other environmental concerns should be mailed to:

San Diego Unified Port District
Development Services Department
Attn: Joseph Smith, Department Manager
P.O. Box 120488
San Diego, CA 92112 0488

Or emailed to: jdsmith@portofsandiego.org

Public Scoping Meeting

A public scoping meeting to solicit comments on the scope and content of the EIR for the proposed project will be held on Monday, March 25, 2019, from 5:00 p.m. to 7:00 p.m. at the San Diego Unified Port District Administration Building, Training Room, 3165 Pacific Highway, San Diego, CA 92101.

The District, as Lead Agency pursuant to CEQA, will review the public comments received during the scoping period to determine what issues should be addressed in the EIR. Other opportunities for the public to comment on the potential environmental effects of the proposed project are as follows:

- A minimum 45-day public review and comment period for the Draft EIR;
- A public hearing for the Board of Port Commissioners to consider certification of the Draft EIR.

For questions regarding this NOP, please contact Joseph Smith, Department Manager, at (619) 686-6597.

Attachments

Figure 1: Regional Map

Figure 2: Project Vicinity

Figure 3: Project Elements

Figure 4: Project Element 1 Representative Photos

Figure 5: Project Elements 2 and 5 Representative Photos

Figure 6: Project Elements 6 and 7 Representative Photos

Figure 7: Project Element 8 Representative Photos

Figure 8: Project Elements 9 and 10 Representative Photos

Figure 9: Project Element 11 Representative Photos

Figure 10: Project Elements 12 and 13 Representative Photos

Figure 11: Existing and Proposed Vessel Arrangement Pier Layout

Initial Study/Environmental Checklist



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Miles

Source: ESRI StreetMap
North America (2010)



Figure 1
Project Location
BAE Systems Waterfront Improvement Project

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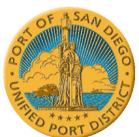
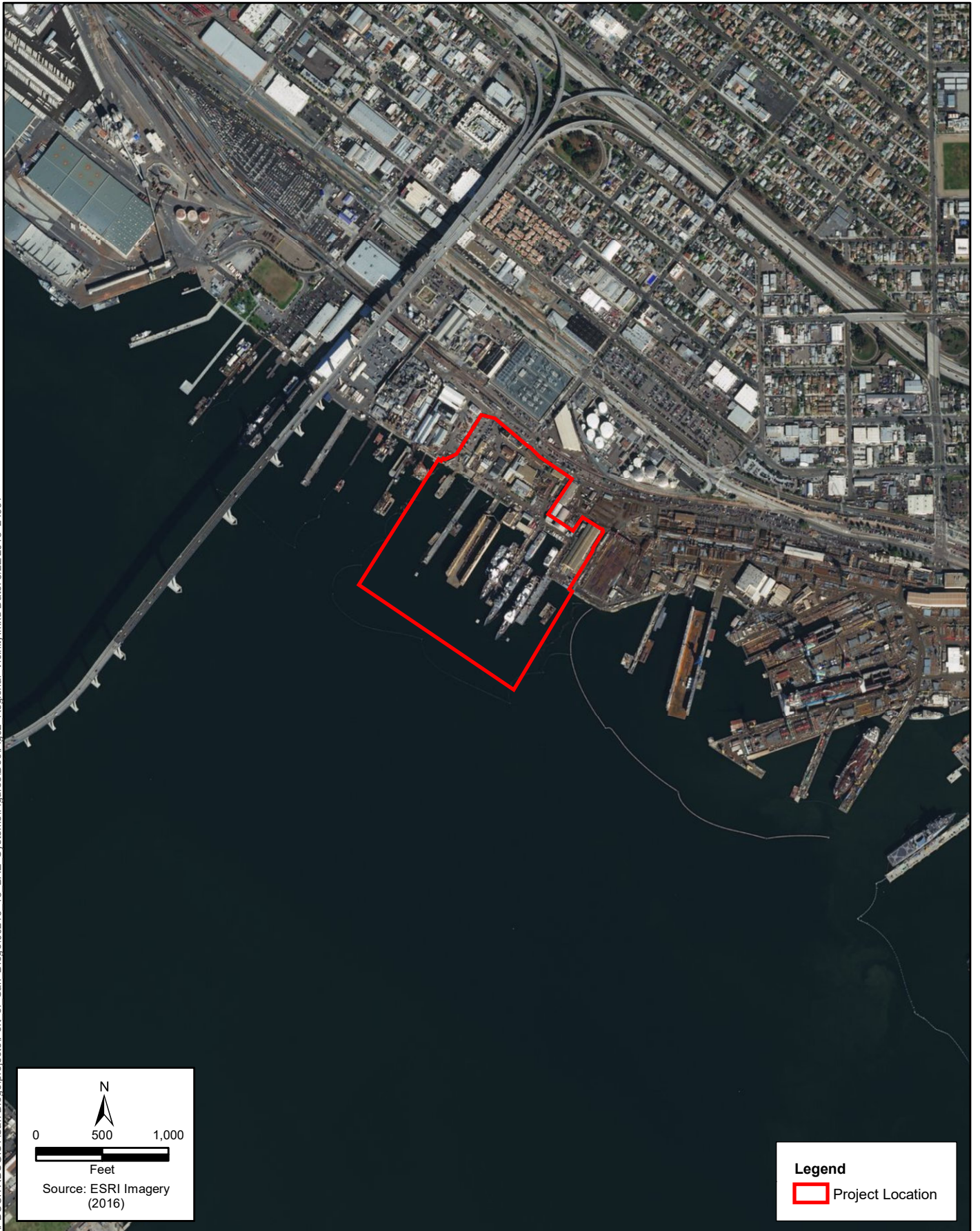


Figure 2
Project Vicinity
BAE Systems Waterfront Improvement Project

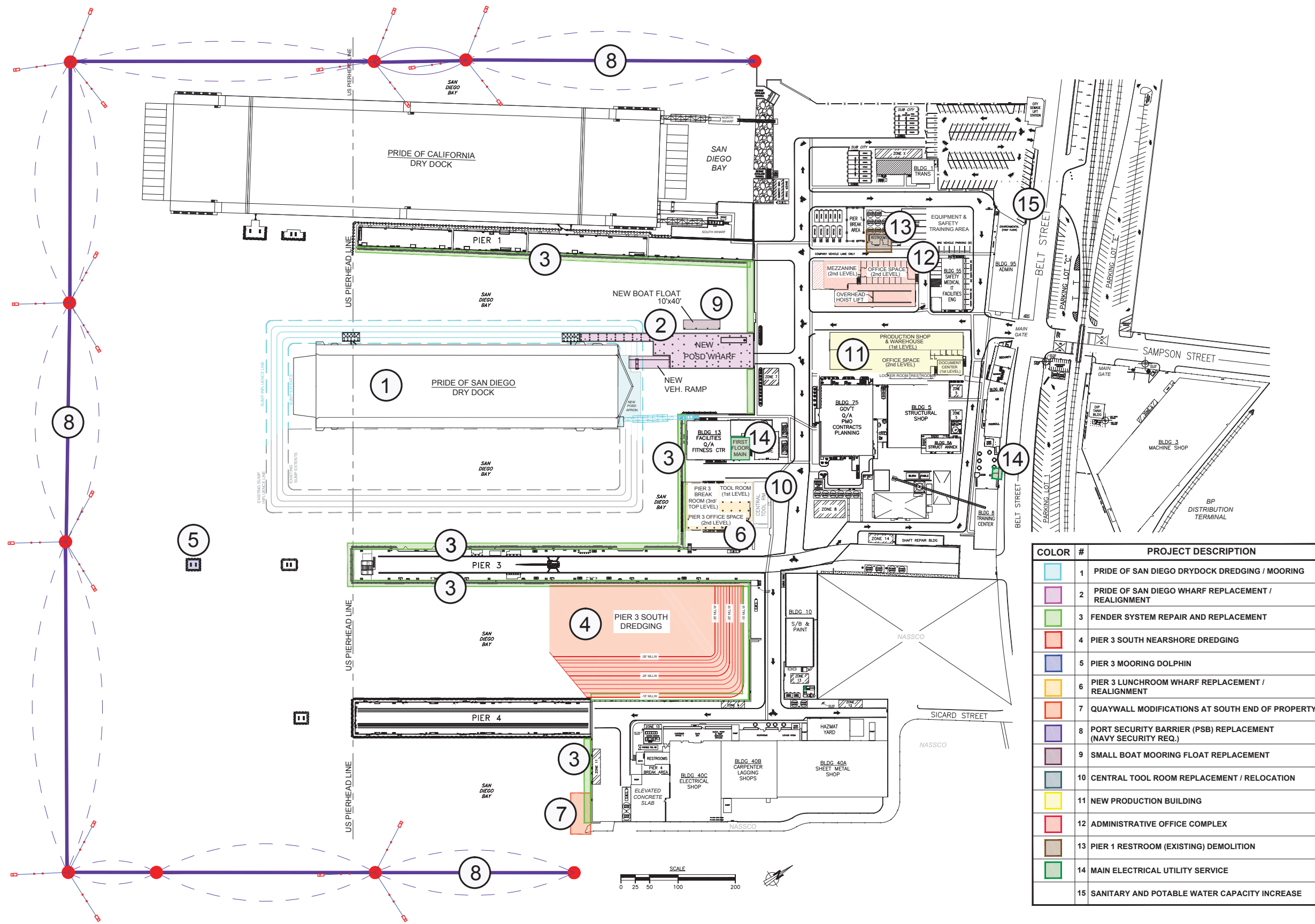


Figure 3
Project Elements
BAE Systems Waterfront Improvement Project

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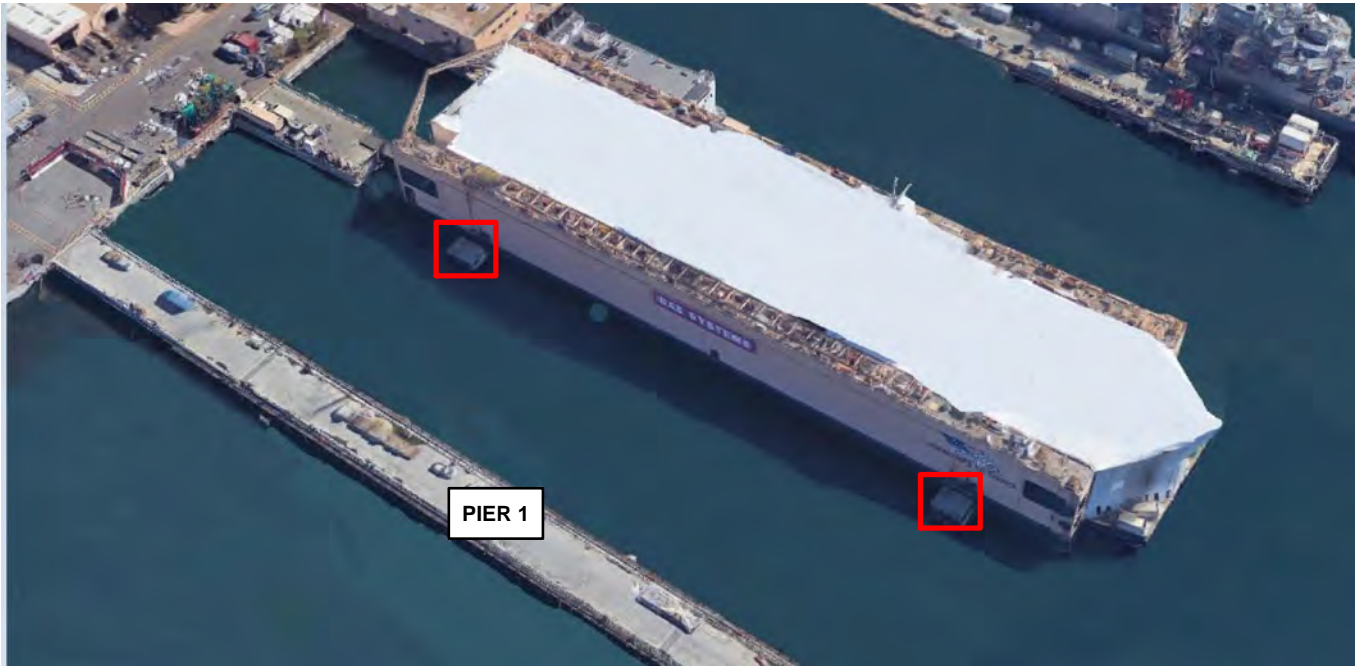
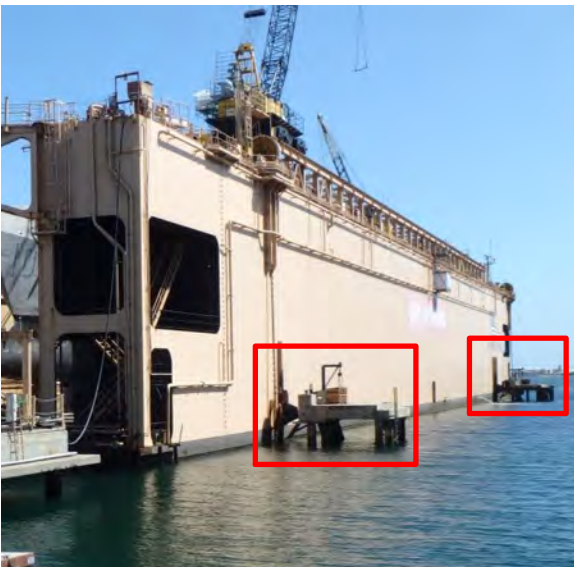


Photo of existing Pride of San Diego mooring dolphins to be demolished in-way-of new Pride of San Diego mooring dolphin construction.



Existing Pride of San Diego dolphins to be demolished for new dolphin construction



Existing Pride of San Diego dolphin to be demolished for new dolphin construction



Figure 4
Project Element 1: Pride of San Diego Dry Dock Dredging / Mooring
BAE Systems Waterfront Improvement Project

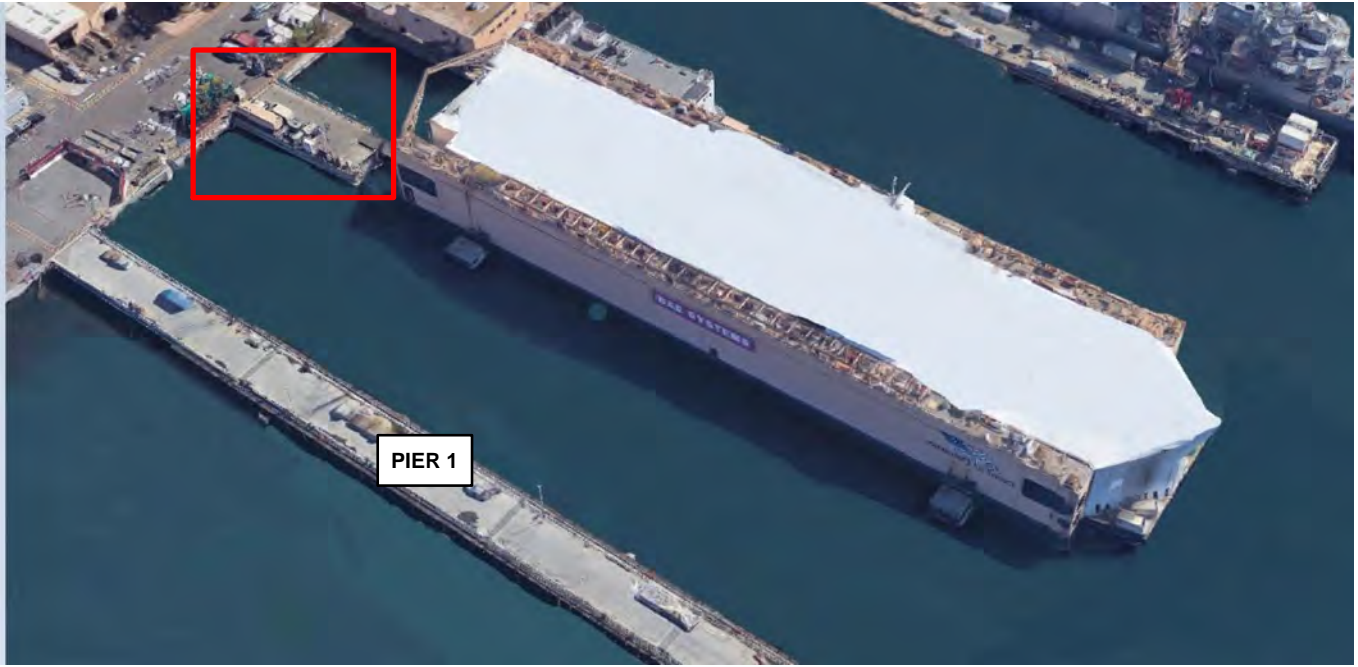


Photo of existing Pride of San Diego ramp wharf to be demolished in-way-of new extended wharf structure.



Approximate location of new pier 3 mooring dolphin



Existing pier 3 mooring dolphin; proposed new dolphin would consist of same design



Figure 5
Project Element 2: Pride of San Diego Wharf Replacement / Realignment and
Project Element 5: Pier 3 Mooring Dolphin
BAE Systems Waterfront Improvement Project



Pier 3 break area and outline of proposed wharf structure



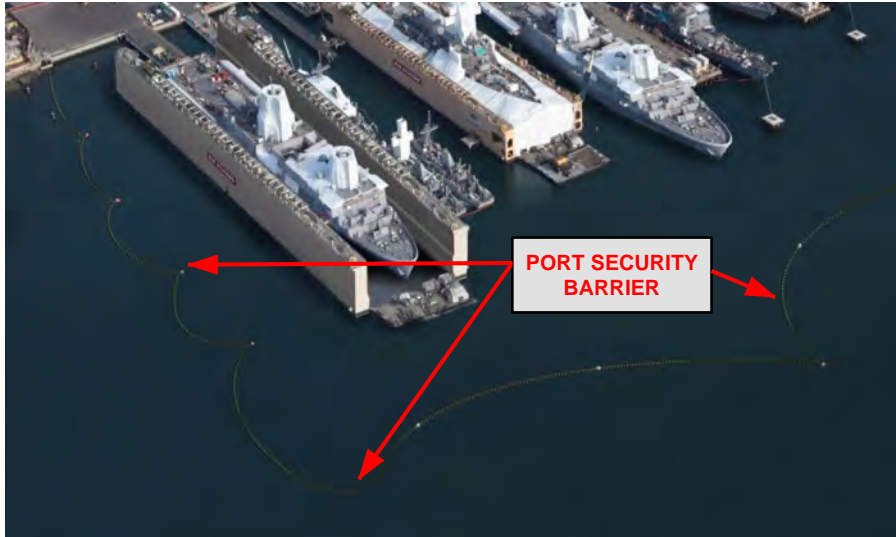
Pier 4 South Quaywall, looking towards south property line



Subsurface and sloped revetment to be removed



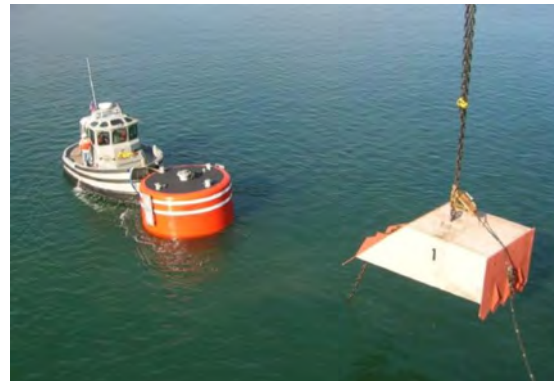
Figure 6
Project Element 6: Pier 3 Lunchroom Wharf Replacement / Realignment and
Project Element 7: Quaywall Modifications at South End of Property
BAE Systems Waterfront Improvement Project



Existing Port Security Barrier (PSB) perimeter around facility waterfront



Proposed PSB Barrier (float sections spanning waterway)



Proposed PSB buried conc. anchor block & mooring buoy



Figure 7
Project Element 8: Port Security Barrier (PSB) Replacement
BAE Systems Waterfront Improvement Project



Existing small craft float



Concrete float concept design mockup



Location of existing tool room to be demolished and incorporated into proposed wharf structure building.



Figure 8
Project Element 9: Small Boat Mooring Float Replacement and
Project Element 10: Central Tool Room Replacement / Relocation
BAE Systems Waterfront Improvement Project



Location of existing bldg 6 & 7 to be demolished in-way-of new production building in similar footprint



Bldg 6/7 (east) to be demolished in-way-of new prod. bldg.



Bldg 6/7 (west) to be demolished in-way-of new prod. bldg.

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Figure 9
Project Element 11: New Production Building
BAE Systems Waterfront Improvement Project



Existing modular offices footprint of new admin. office complex



Modular offices to be removed in-way-of admin. office construction



Existing pier 1 restroom to be demolished and incorporated into new admin complex



Figure 10
Project Element 12: Administrative Office Complex
and Project Element 13: Pier 1 Restroom Demolition
BAE Systems Waterfront Improvement Project

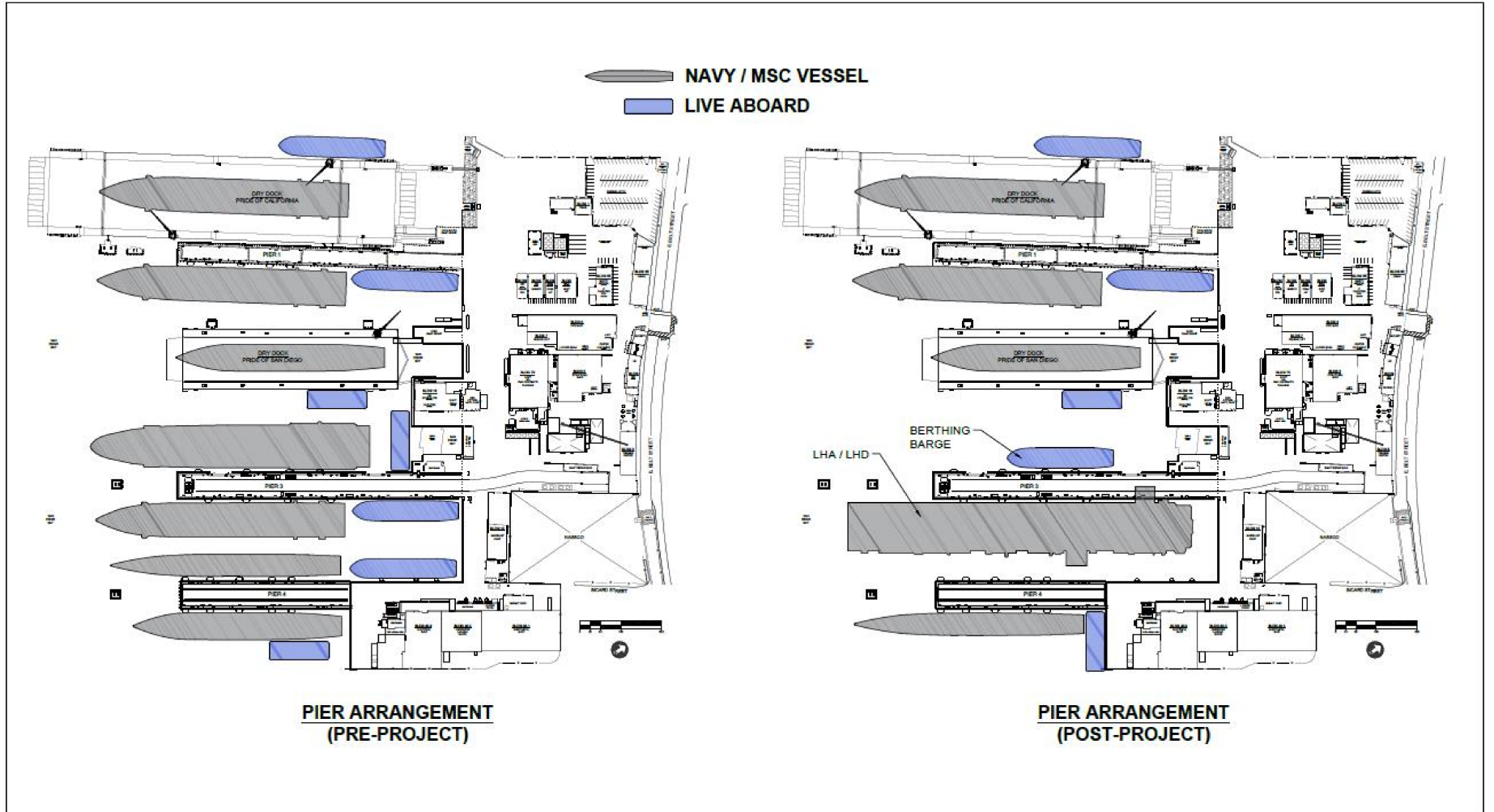


Figure 11
Existing and Proposed Vessel Arrangement Pier Layout
BAE Systems Waterfront Improvement Project



Initial Study/Environmental Checklist

for the

BAE Systems Waterfront Improvement Project

Prepared for
San Diego Unified Port District



March 2019

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Acronyms and Abbreviations

AB	Assembly Bill
ALUCP	Airport Land Use Compatibility Plan
BMPs	Best Management Practices
CARB	California Air Resources Board
CCC	California Coastal Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CWA	Clean Water Act
District	San Diego Unified Port District
DOT	Department of Transportation
DTSC	California Department of Toxic Substances Control
EIR	environmental impact report
FAA	Federal Aviation Administration
GHG	greenhouse gas
HPD	San Diego Harbor Police Department
INRMP	Integrated National Resources Management Plan
JRMP	District's Jurisdictional Runoff Management Program
mgd	million gallons per day
MHPA	Multi-Habitat Planning Area
MSCP	Multiple Species Conservation Program
NAS	Naval Air Station
NOAA	National Oceanic and Atmospheric Administration
OES	Office of Emergency Services
PDP	priority development project
PM10	particulate matter of 10 microns in diameter or smaller
PM2.5	particulate matter of 2.5 microns in diameter or smaller

PRC	Public Resources Code
PSB	Port Security Barrier
PUD	Public Utilities Department
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
Regional Plan	San Diego Forward: The Regional Plan
SANDAG	San Diego Association of Governments
SDAPCD	San Diego Air Pollution Control District
SDFD	City of San Diego Fire-Rescue Department
SDIA	San Diego International Airport
SDMC	San Diego Marine Construction Company
SIP	State Implementation Plan
SLC	State Lands Commission
SR-	State Route
SWM	Southwest Marine, Inc.
SWRCB	State Water Resources Control Board
TCRs	Tribal Cultural Resources
VHFHSZ	Very High Fire Hazard Severity Zones
VOCs	volatile organic compounds

Initial Study/Environmental Checklist

1. Project Title: BAE Systems Waterfront Improvement Project
2. Lead Agency Name and Address: San Diego Unified Port District
Post Office Box 120488
San Diego, CA 92112 0488
3. Contact Person and Phone Number: Joseph Smith, Department Manager
(619) 686-6597
4. Project Location: 2205 E. Belt Street
San Diego, CA 92113
5. Project Sponsor's Name and Address: BAE Systems San Diego Ship Repair Inc.
2205 E. Belt Street
San Diego, CA 92113
6. Port Master Plan Designation: Planning District 4
Land Use Designation: Marine Related-Industrial
Water Use Designation: Specialized Berthing
7. Zoning: See #6 above.
8. Description of Project: BAE Systems San Diego Ship Repair Inc. proposes to replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations at the BAE Systems San Diego Ship Repair Yard. These improvements would allow for newer and different classes of vessels to be moored and repaired on site. The proposed project includes 15 distinct project elements to replace, realign, or improve the existing operational elements.
9. Incorporation by Reference: This Initial Study and the Environmental Impact Report (EIR) for the proposed project will incorporate by reference the Final EIR for the Pier 1 North Drydock, Associated Real Estate Agreements and Removal of Cooling Tunnels Project (Pier 1 North Drydock) (UPD #EIR-2014-31, SCH#2014041071) Volumes 1–4, certified and adopted by the Board of Port Commissions in November 17, 2015, by Resolution Number 2015-152. The Pier 1 North Drydock, Associated Real Estate Agreements and Removal of Cooling Tunnels Project Final EIR is available at the Office of the District Clerk located at 3165 Pacific Highway, San Diego, CA 92101.
10. Other Public Agencies Whose Approval Is Required: U.S. Army Corps of Engineers issuance of Clean Water Act (CWA) Section 404 permit and Section 10, Rivers and Harbors Act Permit; U.S. Environmental Protection Agency (EPA) issuance of Ocean Dumping Permit; U.S. Coast Guard concurrence with Ocean Dumping Permit; National Marine Fisheries Service and U.S. Fish and Wildlife Service concurrence with Ocean Dumping Permit; Regional Water Quality Control Board issuance of CWA Section 401 Certification; California Coastal Commission issuance of Coastal Development Permit; State Lands Commission issuance of lease; City of San Diego issuance of ministerial permits.

Environmental Factors Potentially Affected

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology and Water Quality |
| <input checked="" type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources | <input checked="" type="checkbox"/> Utilities and Service Systems |
| <input checked="" type="checkbox"/> 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 pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature:



Wileen Manaois
Director, Development Services

Date:

March 5, 2019

Evaluation of Environmental Impacts

The following discussion addresses impacts on various environmental resources, per the Environmental Checklist Form contained in Appendix G of the State CEQA Guidelines.

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 such as the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained if 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, 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 environmental impact report (EIR) is required.
4. “Negative Declaration: Less-than-Significant Impact with Mitigation Incorporated” applies when the incorporation of mitigation measures has reduced an effect from a “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.
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other California Environmental Quality Act (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 earlier analyses 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 Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when 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 a less-than-significant level.

I. Aesthetics

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

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

Less-than-Significant Impact. The project site is located in the San Diego Unified Port District's (District's) jurisdiction, within the urban setting of downtown San Diego. The visual character of the project site and surrounding area is defined by the existing industrial uses, proximity to Coronado and the San Diego–Coronado Bay Bridge, and the commercial and residential uses in the adjacent community of Barrio Logan. Views of the project site from nearby surrounding areas include large ships, working piers, berths, security fencing, lighting, and dry docks.

Scenic vistas within the project vicinity are designated in the District's Port Master Plan (PMP), which provides a framework for the consideration of vistas areas that have been recognized as scenic and visually important to the area and the region. The PMP considers the scenic quality of the land within its jurisdiction and establishes District policies for maintenance of important views. Within many of its precise plans, the District has identified vista areas—key viewpoints from which to enjoy the scenic beauty of the Bay and other visible District features. Vista areas within the District's jurisdiction are identified on the PMP's precise plans by arrow symbols, which are placed on the vista areas and pointed toward the intended view. The Public Recreation portion of Section III of the PMP explains that these symbols identify "points of natural visual beauty, photo vantage points, and other panoramas. It is the intent [of the PMP] to guide the arrangement of development on those sites to preserve and enhance such vista points."

The proposed project is located in Planning District 4 of the adopted PMP, which does not contain any designated vista areas (see Figure 13 of the PMP). The nearest designated vistas are in Planning District 3 (Centre City/Embarcadero), approximately 1.3 miles northwest of the project site on the same (east) side of the San Diego Bay, and Planning District 6 (Coronado Bayfront), located approximately 1.3 miles west of the project site across the Bay. Within Planning District 3, there is a designated vista area near the San Diego Convention Center that faces west, toward the bay and Coronado beyond that. The project site is southeast of this designated vista area. No views of the project site exist from this vista area, and none would be affected by the proposed project. Within Planning District 6, areas near First Street and Orange Avenue with westerly views of downtown San Diego from Coronado have been designated as vista areas; however, no views of the project site are available from this vista area. Additionally, designated scenic vistas along Second and Third Streets contain brief, but mostly obstructed, views of the project site. Moreover, the 33-acre project site (12 acres of land and 21 acres of water from the District) is only a small portion of the viewshed from Coronado, with the project site in character with the naval shipyards immediately to the southeast. Therefore, the existing views from Coronado would not substantially change

with implementation of the proposed project, and impacts on scenic vistas would be less than significant. No further discussion is warranted in the EIR.

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

Less-than-Significant Impact. The San Diego–Coronado Bay Bridge (State Route [SR-] 75) is a California State-designated scenic highway, located just north of the project site, which spans the Bay, connecting the City of San Diego to the City of Coronado (DOT 2018). Existing long-distance views of the downtown San Diego area from the San Diego–Coronado Bay Bridge are dominated by a mix of high-rise residential, commercial, and urban developments; while views of the project site and surrounding area include a variety of maritime industrial facilities (such as storage structures, large vessels, docks, piers, cranes, trucks, and other large pieces of shipping equipment) associated with the existing ship repair yard and Tenth Avenue Marine Terminal (TAMT). From SR-75, the project site appears in the foreground of adjacent industrial uses and behind the water of San Diego Bay. Ships, silos, warehouses, and heavy industrial machinery are visible under existing conditions. Views of the site include piers, large ships, mooring dolphins, permanent and modular buildings, and associated equipment at the site.

Implementation of the proposed project is not anticipated to damage scenic resources, such as trees or rock outcroppings along a scenic highway, because there are no such resources at the project site. Visual changes associated with the project would include the addition of mooring dolphins, Quay Wall modifications, and replacement of existing structures and piers. Although these visual changes would be at least partially visible from portions of SR-75, they would not be readily noticeable because of the distance between the site and SR-75. Additionally, the project site is currently dominated by industrial uses and facilities, and would continue to be industrial in nature upon project completion. Furthermore, motorists traveling on SR-75 would generally be focused on the roadway in front of them. Their southerly views while traveling westbound or eastbound would not be prolonged, and viewer sensitivity to the proposed changes would be low. The proposed additions at the project site would be similar in size, color, and scale as elements of the existing developed site, which would continue to appear as a working ship repair yard. While Project Elements 10 (Central Tool Room Demolition and Reconstruction), 11 (New Production Building), and 12 (Administration Office Building) propose to increase the height of the existing 1-story structures to 3-story structures, several 2-story structures and larger cranes are already located on the project site, and there are large industrial tanks, cranes, and large structures in the surrounding area. Due to the height of existing features in the background such as cranes and tanks, the proposed project would be compatible with the surrounding area and would not substantially degrade the existing view. Therefore, impacts on designated scenic highways would be less than significant, and no further discussion is warranted in the EIR.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less-than-Significant Impact. The proposed project would be within an area of the District that is developed entirely with industrial and maritime uses. The proposed project's improvements to existing infrastructure to increase space utilization and increase efficiency of operations would be consistent with the site and surrounding area's existing industrial visual character and quality, and the project site would continue to appear as a working ship repair yard. As discussed above in response to question 1.b, the project components would be similar in color, size, bulk, and scale to existing structures at the project site and in the surrounding vicinity. While Project Elements 10 (Central Tool Room Demolition and Reconstruction), 11 (New Production Building), and 12 (Administration Office Building) propose to increase the height of the existing 1-story structures to 3-story structures, several 2-story structures and larger cranes are already located on the project site, and there are large industrial tanks, cranes, and structures in the surrounding area. Due to the height of existing features in the background, such as cranes and tanks, the proposed project would be compatible with the surrounding area and would not be discernable from the surrounding industrial development. Similarly, the proposed waterside project elements would be compatible with other surrounding in-water structures and facilities and would typically involve the replacement of existing structures with new structures that would be similar in size and appearance. Therefore, the proposed project would have less-than-significant impacts on the visual character and quality of the surrounding area, and no further discussion is warranted in the EIR.

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

Less-than-Significant Impact. The project site is an existing shipyard repair facility, which currently provides lighting inside, and security lighting outside of, the existing structures. The proposed project would not require the installation of new outdoor lighting that could affect nighttime views. The proposed project would augment existing exterior lighting with lighting on the proposed equipment necessary to provide adequate illumination to safely access the equipment and provide security. All new lighting would be aimed toward the facility with the necessary shrouds to limit spill light. In addition, implementation of the project elements would not result in the installation of buildings or structures with highly reflective materials. The new replacement lighting would be consistent with the type of marine industrial lighting that currently exists on the site, as well as up and down the eastern San Diego Bay shoreline. Furthermore, none of the operational changes associated with the proposed project would generate new sources of substantial lighting or glare. Therefore, lighting and glare-related impacts from the proposed project would be less than significant, and no further discussion is warranted in the EIR.

II. Agricultural and Forestry Resources

In determining whether impacts on 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on 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 Incorporated	Less-than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

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

No Impact. The project site is located entirely within the District. According to the California Department of Conservation's San Diego County Important Farmland 2016 map, the project site is classified as "Urban and Built-Up Land" and "Other Land," which do not contain agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2016). Construction of any of the project elements would not impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and there is no potential for any actions to convert farmland resources to nonagricultural uses. Similarly, no components of the proposed project would convert farmland resources to nonagricultural uses once operational. No impact would occur, and no further discussion is warranted in the EIR.

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

No Impact. The project site is not zoned for agricultural use, nor is there a Williamson Act contract for the site (DOC 2013). Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur. No further discussion is warranted in the EIR.

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

No Impact. The project site is classified as "Urban and Built-Up Land" and is not zoned as forest land, timberlands, or timberland zoned Timberland Production (DOC 2016). No land that has been zoned as forest land or timberland exists within the boundaries of the project site. No impact would occur, and no further discussion of this topic is warranted in the EIR.

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

No Impact. As discussed under question II.c, no land that has been zoned as forest land or timberland exists within the boundaries of the project site. Implementation of any of the project elements would not result in a loss of forest land or the conversion of forest land to other uses. No impact would occur, and no further discussion of this topic is warranted in the EIR.

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

No Impact. See question II.a. Implementation of the proposed project would have no impact on agriculture and/or forestry resources. No agricultural land, forest land, or timberland exists on or in the vicinity of the project site. The proposed project would not involve changes to the existing environment that, because of their location or nature, could result in the conversion of Farmland to nonagricultural use or forest land to non-forest use. No impact would occur and no further discussion is warranted in the EIR.

III. Air Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

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

Potentially Significant Impact. The San Diego County Air Pollution Control District (SDAPCD) is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria pollutants for which the County is in nonattainment (i.e., ozone, particulate matter of 10 microns in diameter or smaller [PM10], and particulate matter of 2.5 microns in diameter or smaller [PM2.5]). The Regional Air Quality Strategy (RAQS) projects future emissions and determines the strategies necessary for the reduction of stationary source emissions through regulatory controls to attain the CAAQS for ozone. The federal Clean Air Act also mandates that the state submit and implement a State Implementation Plan (SIP) for local areas not meeting those standards. California Air Resources Board (CARB) mobile source emission projections and San Diego Association of Governments (SANDAG) growth projections are based on population and vehicle trends and land use plans developed by local agencies. As such, projects that propose development that is consistent with the growth anticipated by the relevant land use plans that were used in the formulation of the RAQS and SIP would be consistent with the RAQS and SIP. The PMP is the governing land use document for physical development under the jurisdiction of the District. Therefore, projects that propose development consistent with growth anticipated by the current PMP are considered consistent with the RAQS and SIP. Moreover, in the event that a project proposes development that is less dense than anticipated within a general plan (or other governing land use document such as the PMP), the project would likewise be consistent with the RAQS and SIP because emissions would be less than estimated for the existing PMP. If a project proposes development that is greater than that anticipated in the PMP and SANDAG's growth projections, the project would be in conflict with the RAQS and SIP, and might have a potentially significant impact on air quality because emissions would exceed those estimated for the existing PMP. Because the proposed project would have potential operational changes, further analysis will be provided in the EIR.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. Implementation of the proposed project has the potential to result in air quality impacts through the use of heavy-duty construction equipment, construction worker vehicle trips, truck haul and material delivery trips, off-gassing from paving activities, dredging activities, and fugitive dust from demolition and grading activities. Mobile-source criteria pollutant emissions would result from the use of construction equipment and vehicles, and re-paving would result in emissions of volatile organic compounds (VOCs) associated with off-gassing. While the proposed project would result in no new berthing space, it would replace and improve facilities that would increase the efficiency of operations and allow for newer and larger Navy vessels to be accommodated compared to existing conditions. These improvements may change operational activities, resulting in new or different sources of emissions. Therefore, this issue area will be analyzed in the EIR.

c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. The San Diego Air Basin (SDAB) is in nonattainment status for ozone (8-hour standard) at the federal and state level; and for ozone (1-hour standard), PM10, and PM2.5 at the State level. Implementation of the proposed project could result in a cumulatively considerable net increase in these criteria pollutants. Therefore, further discussion will be provided in the EIR.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors in the area are primarily the residential, school, and park areas east of the project site in the Barrio Logan neighborhood. Construction and operation of the proposed project elements could result in criteria pollutant and toxic air contaminants (TAC) emissions in different quantities than existing conditions. Activities associated with each project element would include diesel equipment activity near existing sensitive receptors, both within the project site and in surrounding neighborhoods. Implementation of the proposed project may result in new or different sources of emissions. Therefore, this issue area will be analyzed in the EIR.

e. Create objectionable odors affecting a substantial number of people?

Potentially Significant Impact. According to CARB's *Air Quality and Land Use Handbook* (2005), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding facilities. The proposed project does not include any uses identified by CARB as being associated with odors. However, construction activities may involve odors from diesel exhaust, asphalt paving, and the use of any architectural coatings; also, during operations odors could occur with diesel exhaust from trucks as well as any solvents used during ship building and repair. Impacts are potentially significant, and this topic will be analyzed further in the EIR.

IV. Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

- 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?**

Potentially Significant Impact. The California Natural Diversity Database (CNDDDB) was reviewed to identify special-status species that are known to occur within 1 mile of the project site. Eleven special-status plant species and 14 special-status wildlife species have been recorded within 1 mile of the project site. Due to the industrial nature of the proposed project site, special-status plant species are not present. However, due to the project site's proximity to San Diego Bay and downtown San Diego there is potential for American peregrine falcon, California brown pelican, and California least tern (all of which are state

fully protected species) to occur on the landside portion of the project site. For the marine portion of the project, there is potential for green sea turtle, coastal bottlenose dolphin, and common dolphin. While these occurrences are likely transient in nature, green sea turtle is federally threatened, and both dolphin species are protected under the Marine Mammal Protection Act. Construction activities at the project site could result in a significant impact on these special-status wildlife species.

Dredging activities are planned for Project Elements 1 (Pride of San Diego Drydock), 4 (Pier 3 South Nearshore Dredging), and 7 (Quay Wall Modifications) to remove sediment that has accumulated at these locations. Dredging has the potential to elevate turbidity within the project area, which may impact California least tern and California brown pelican foraging. In addition to elevated turbidity, in-water noise associated with dredging may have negative impacts on green sea turtle and both dolphin species.

Because there are potential impacts related to implementation of the proposed project elements, a full analysis will be provided in the EIR to determine if a significant impact would occur on candidate, sensitive, or special-status species.

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 Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact. The landside portion of the project site consists entirely of developed land; there are no sensitive vegetation communities or areas of riparian habitat on site. The vegetated, shallow subtidal habitat of San Diego Bay is dominated by eelgrass. Eelgrass beds function as important habitat for a variety of invertebrate, fish, and avian species. Although eelgrass is not a threatened or endangered species, it is considered essential fish habitat and a Habitat Area of Particular Concern under the Magnuson-Stevens Fishery Management and Conservation Act, the federal legislation that protects waters and substrates necessary for fish spawning, breeding, feeding, or growth to maturity. Because of its designation as a habitat area of particular concern and its notable contributions to ecological processes, it is also protected under the Clean Water Act (CWA) and is managed by the National Oceanic and Atmospheric Administration (NOAA) in California through adherence to the California Eelgrass Mitigation Policy (NOAA 2014). Given the abundance of eelgrass within San Diego Bay, its preferred habitat in shallow water (typically near shore), and its designation as a habitat area of particular concern, there is a potential for in-water construction and operational activities associated with the proposed project to result in impacts on eelgrass potentially present within or adjacent to the project site. These impacts would be potentially significant; therefore, further analysis is warranted in the EIR.

c. Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The project site consists of developed land as well as open water. Based on a review of aerial images (NETR 2018) as well as site visit conducted on April 17, 2018, the project site does not contain federally protected wetlands as defined under Sections 401 and 404 of the CWA or state wetlands protected under the California Coastal Act; therefore, the proposed project would not impact federally protected wetlands and no further discussion is warranted in the EIR.

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?

Potentially Significant Impact. The landside portion of the project site consists entirely of developed land, and there are no wildlife corridors within the project site (District 2015). Native species present on site are limited to those that commonly occur in heavily developed areas. Such species would not be substantially affected by the proposed project. Additionally, because the project site is an existing ship repair yard developed entirely with industrial and maritime uses, it would not function as a wildlife corridor or a nursery site. Furthermore, the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan and District's Integrated National Resources Management Plan (INRMP) do not identify any wildlife

corridors or nursery sites within the project site (City of San Diego 1997; District 2013). The waterside portion of the project site consists primarily of open water. However, as discussed above under question IV.b, in-water construction work associated with the proposed project would have the potential to result in impacts on eelgrass potentially present within or adjacent to the project site. Eelgrass beds function as important habitat for a variety of invertebrate, fish, and avian species, including serving as nursery sites for numerous fish species. Construction and operational activities associated with the proposed project could result in increased levels of turbidity or accidental damage to eelgrass beds, which could impact nursery habitat for fish species. Impacts would be potentially significant, and further analysis is warranted in the EIR.

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

Potentially Significant Impact. The City of San Diego MSCP Subarea Plan does not apply to projects within the District's jurisdiction, nor is any City of San Diego Multi-Habitat Planning Area (MHPA) present within the District's jurisdiction or adjacent to the project site. The project site is several miles outside the boundary of the closest MHPA, which is the planned habitat preserve within the City of San Diego MSCP Subarea.

The applicable local land use plans, policies, ordinances, or regulations of the District, adopted for the purpose of protecting biological resources, are the PMP, San Diego Unified Port District Code, and the District's INRMP. The District and the U.S. Navy Southwest Division maintain and implement the INRMP, which catalogues the plant and animal species around the Bay and identifies habitat types to ensure the long-term health, recovery, and protection of San Diego Bay's ecosystem in concert with economic, Naval, recreational, navigational, and fisheries needs. Additionally, the District has established goals to protect, preserve, and enhance natural resources in San Diego Bay in Section II of the PMP, *Planning Goals* (Goal XI). The project site is located within the District's PMP Planning District 4. The PMP's conservation policies focus on protecting and restoring functional areas of high ecological value, none of which are located within or adjacent to the project site. However, the proposed project includes in-water work that has the potential to result in significant impacts on biological resources of the San Diego Bay. Therefore, the proposed project would potentially conflict with local policies or ordinances protecting biological resources. Impacts would be potentially significant, and, further analysis is warranted in the EIR.

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?

Potentially Significant Impact. The project site is within the City of San Diego MSCP boundaries, although it is several miles beyond the closest City of San Diego MHPA, which is the planned habitat preserve within the MSCP Subarea Plan. However, the MSCP Subarea Plan does not apply to projects within the jurisdiction of the District, including the proposed project.

As previously mentioned, the District and the U.S. Navy Southwest Division maintain the INRMP, which aims to ensure the long-term health, recovery, and protection of San Diego Bay's ecosystem. In-water work associated with the proposed project has the potential to result in significant impacts on biological resources of the San Diego Bay. Therefore, development of the proposed project will be reviewed with the goals and intent of the INRMP and a more detailed analysis will be provided in the EIR.

V. Cultural Resources

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. The project site was developed as a marine ship construction and repair facility beginning in 1915. That year, the San Diego Marine Construction Company (SDMC) leased tidelands at the foot of Sampson Street to establish such a facility. The lease allowed SDMC to reclaim tidelands at this location by extracting fill material from the adjacent bay but not by transporting fill to the site from elsewhere. By the end of the 1960s, the project site was an approximately 50-year-old waterfront industrial complex where SDMC continued to construct and repair ships. In 1972, SDMC sold its lease on the property to a subsidiary of Campbell Industries that changed its name to the San Diego Marine Construction Company. In 1979, Southwest Marine, Inc. (SWM) acquired the property. SWM also acquired the ARCO (formerly Richfield Oil) marine fuel pier in 1982 and added the former National Pump & Injector Sales and Service leasehold to its facility in 1985. SWM changed its name to BAE Systems San Diego Ship Repair, Inc. in 2005 (Tetra Tech, Inc. 2016:9–10). As an industrial site for the construction and maintenance of marine vessels that has operated for over 100 years, the facility has been continually subject to physical alteration from maintenance activities and from replacement or repurposing of buildings and structures to accommodate the changing technology of shipbuilding.

To qualify as historical resources under CEQA, buildings or structures need to have historical significance as well as historical integrity with respect to their period of significance. While buildings or structures less than 50 years old sometimes qualify as historical resources under CEQA when they are exceptionally significant, this remains rare, and an overwhelming majority of historical resources are 50 years old or older. Although several buildings and structures at the BAE Systems site that would be physically altered by the proposed project incorporate elements that are 50 years old or older, those buildings and structures have been subject to substantial alteration. Limited portions of Pier 3 are over 50 years of age, but historic aerial photographs show that this pier was dramatically altered in the 1980s. A fairly narrow structure in the early 1990s, Pier 1 was altered into a much wider structure after 2000. The Production Building is an amalgamation of dissimilar structures that have been joined together over time prior to and during the last 50 years (NETR 2018). These built resources do not maintain historical integrity with respect to a discernable period of potential significance 50 years ago or earlier, and therefore are not considered historical resources under CEQA. For these reasons, the proposed project elements that would alter these buildings and structures, including Project Elements 3 (Fender System Repair and Replacement), 6 (Pier 3 Lunchroom Wharf Replacement and Realignment), and 11 (New Production Building) would not result in

an impact on any built resource with potential to qualify as a historical resource. Therefore, no impact would occur, and no further analysis is warranted in the EIR.

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

No Impact. The entire project area consists of constructed fill or water. Analysis of historic maps shows that the historic shoreline in 1857 was to the east of the project area; therefore, no native soil is present in the project area. A record search was conducted on April 25, 2017, by South Coastal Information Center located on the San Diego State University campus. The record search revealed that no archaeological resources are present within the project area. Therefore, because the record search was negative and no native soils are present in the project area that could contain an intact archaeological deposit, no impact would occur. Accordingly, no further analysis is warranted in the EIR.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-Significant Impact. The proposed project includes both landside and waterside improvements. Based on review of historic maps and a Geotechnical Report prepared for the BAE Pier 1 North Drydock Project EIR, the landside portion of the project site consists of modern fill approximately 8 to 10 feet deep (Terra Costa Consulting Group 2015), although specific depths are unknown. Below areas of fill, the bayfront is underlain by Bay Point Formation (Kennedy and Tan 2008). Bay Point Formation is a near-shore marine sedimentary deposit that dates from the late to middle Pleistocene, roughly 10,000 to 600,000 years ago. A tremendous variety of invertebrate and vertebrate fossils have been found in this deposit, including both marine and terrestrial animals, with mammoth and whale remains being some of the most significant. The formation is assigned high resource sensitivity in the City of San Diego's CEQA Significance Determination Thresholds. Pursuant to the City of San Diego's Municipal Code Chapter 14, Article 2, Division 11: Grading Regulations, any proposed excavation or other ground disturbing activities in a paleontological sensitive area would need to comply with the City's Municipal Code Section 142.0151; which requires paleontological resource monitoring when grading involves 1,000 cubic yards or greater, and results in 10 feet or greater in depth within in a highly sensitive formation. The City of San Diego's grading regulations stipulate treatment of any paleontological resources that are discovered during grading activities which would minimize potential disturbance to paleontological resources. Compliance with the City's grading regulations would reduce potential impacts to paleontological resources to less than significant.

Based on the Geotechnical Report (Terra Costa Consulting Group 2015), the geology of the waterside portion of the project site consists of several layers. The geotechnical report states that the waterside portion of the project site consists of Holocene deposits, underlain by a thin layer of younger Quaternary terrace deposits, which are underlain by older Quaternary deposits. The change between Holocene deposits and younger Quaternary terrace deposits range between elevations of -16 and -20 feet mean lower low water (MLLW). The change between younger and older Quaternary deposits occurs around -65 feet MLLW. It was estimated that the top of the San Diego Formation is near elevation -150 feet MLLW. As a reference, the City of San Diego's CEQA Significance Determination Thresholds assign low paleontological sensitivity to Holocene and Quaternary deposits, and high paleontological sensitivity to the San Diego Formation. Waterside project activities would consist of dredging to depths of -70 feet and excavation of up to 95,000 cubic yards for the replacement of the mooring dolphins that hold the Pride of San Diego drydock in place. As such, because waterside project-related activities would not reach geologic formations of high paleontological sensitivity, and therefore would not destroy a unique paleontological resource, impacts would be less than significant. No further analysis is warranted in the EIR.

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

Less-than-Significant Impact. No evidence in the historical record indicates that human remains were buried on site. It is highly unlikely that human remains would be encountered during construction of the proposed project as the project site consists of imported fill and water. Bay Point Formation deposits that are marine in origin and date from 10,000 to 600,000 years ago underlie these fill layers. However, if human

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remains should be discovered during construction, while unlikely, they would be treated in accordance with existing laws and regulations, notably Public Resources Code (PRC) Section 5097 and Health and Safety Code Section 7050.5, which would ensure that impacts would be less than significant. Therefore, no further analysis is warranted in the EIR.

VI. Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic groundshaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on geologic units 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2016), creating substantial risks to life or property?*	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Geology and Soils question (d) reflects the current 2016 California Building Code, effective January 1, 2017, which is based on the International Building Code (2015).

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

a. Expose people or structures to 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.

Less-than-Significant Impact. According to the City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Sheet 13, the project site is not located within an active, Alquist-Priolo Earthquake Fault Zone (City of San Diego 2008a). As such, project construction and operation would not exacerbate

the potential rupture of a known earthquake fault. Therefore, impacts would be less than significant, and no further analysis is warranted in the EIR.

ii) Strong seismic groundshaking?

Less-than-Significant Impact. As discussed above, according to the City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Sheet 13, the project site is not located within an active, Alquist-Priolo Earthquake Fault Zone (City of San Diego 2008a). However, the San Diego region is subject to earthquakes, which can result in strong seismic ground-shaking. As such, the project site could be exposed to strong seismic ground-shaking in the future. At question, however, is not whether the project site would experience strong seismic ground-shaking, but rather if the proposed project's construction and operation would exacerbate such effects on future users at the project site. Since the proposed project would have no potential to result in any increased chance of strong seismic ground-shaking (i.e. increase the risk of an earthquake), no impact would occur and no further analysis is warranted in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. The proposed project site is underlain by relatively loose, unconsolidated bay deposits and fill materials. The potential for liquefaction at the proposed project site is high due to the area's shallow groundwater table and the low density of the underlying sandy subsurface materials. Additionally, the City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Sheet 13, maps the proposed project site as being in an area with a high potential for liquefaction.

Three key components are required for liquefaction: (1) liquefaction-susceptible soils; (2) groundwater; and, (3) strong groundshaking, such as that caused by an earthquake. The Geotechnical Report prepared for the BAE Pier 1 North Drydock Project EIR (Terra Costa Consulting Group 2015) notes that the recent bay deposits are considered liquefiable. However, the Geotechnical Report indicates that the subsurface soils within the Holocene, the younger Quaternary terrace deposits, and the older Quaternary terrace deposits are generally non-liquefiable. There are several isolated pockets of soils that might liquefy, but due to the general heterogeneous nature of the Quaternary terrace deposits, the impact associated with these layers is considered less than significant. Moreover, design and construction of the proposed project would be required to comply with all seismic safety development requirements, including Title 24 standards contained within the current California Building Code. Because the proposed project would be engineered to eliminate the liquefaction hazard and would not exacerbate the potential for liquefaction to occur, impacts associated with liquefaction or other seismic-related ground failure would be less than significant. Therefore, no further analysis is warranted in the EIR.

iv) Landslides?

No Impact. Landslide activity generally occurs in areas that lack vegetation and have steep slopes (typically, with grades of 30% or more). The project site is situated on fill areas that are flat and completely developed. Additionally, the project site is not mapped within a landslide hazard zone in the City of San Diego's Seismic Safety Study (City of San Diego 2008a). No portion of the project site would be susceptible to landslides. As such, the proposed project would not exacerbate the potential for landslides to occur at the project site or surrounding area. Therefore, no impacts would occur, and no further discussion of landslides is warranted in the EIR.

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

No Impact. The paved project site is an existing ship repair yard that was constructed on artificial fill. None of the actions associated with the proposed project would disrupt any native soil or topsoil. In addition, consistent with the District's Jurisdictional Runoff Management Program (JRMP) (pursuant to State Water Resources Control Board Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and R9-2015-0100 [NPDES Permit #CAS0109266, Municipal Permit]), the proposed project would be designed with Best Management Practices (BMPs) consistent with the District's BMP Design Manual, which requires the use of low-impact development BMPs, as well as source control and treatment control BMPs (District 2016). As

such, soil erosion is not anticipated to occur as a result of construction or operation at the project site. Therefore, no impact would occur, and further discussion in the EIR is not warranted.

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

Less-than-Significant Impact. Refer to questions VI.a (iii) and (iv), respectively, for a discussion of potential impacts associated with liquefaction and landslides. Bay deposits and fill layers that underlie the project site could be unstable because of their liquefaction potential. The project site does not contain slopes exceeding a 25% grade, nor is it mapped within a landslide hazard zone in the City of San Diego's Seismic Safety Study (City of San Diego 2008a), and therefore would not be susceptible to on- or offsite landslides. There are several isolated pockets of soils that might liquefy (Terra Costa Consulting Group 2015). However, due to the general heterogeneous nature of the Quaternary terrace deposits, the impact associated with these layers is considered less than significant. Moreover, design and construction of the each of the landside proposed project elements, including Project Elements 2 (Pride of San Diego Wharf Replacement and Realignment), 6 (Pier 3 Lunchroom Wharf Replacement and Realignment), 10 (Central Tool Room Demolition and Reconstruction), 11 (New Production Building), 12 (Administration Office Building), and 13 (Pier 1 Restroom Renovation and/or Demolition), would be required to comply with all seismic-safety development requirements, including Title 24 standards of the current California Building Code. Because the proposed project would be engineered to eliminate the liquefaction hazard and would not exacerbate the potential for liquefaction to occur, impacts associated with liquefaction or other seismic-related ground failure would be less than significant. Due to these onsite conditions and mandatory compliance with applicable regulations, the proposed project would not exacerbate existing unstable conditions, and no further discussion is warranted in the EIR.

d. *Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2016), creating substantial risks to life or property?*

Less-than-Significant Impact. Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content as well as a significant decrease in volume with a decrease in water content. Changes in the water content of highly expansive soils can result in severe distress for structures constructed on or against the soils. Underlying soils found on site are partially composed of clays and, as such, could be subject to expansion. Huerhuero-Urban land complex (2 to 9% slope) has a high shrink-swell behavior, Urban land has variable shrink-swell behavior, and Tidal flats have a high shrink-swell behavior (USDA 1973). Should any soil failure occur, risks to life or property associated with the proposed project may increase due to the construction of new structures. Construction of the proposed project would be subject to applicable standards of the current California Building Code (California Code of Regulations Title 24), and expansive soils would be removed and replaced with engineered soil. The project site is underlain by Urban Land, which is identified as having a variable shrink-swell potential (U.S. Department of Agriculture 1973). Because of the developed nature of the project site, it is likely that any expansive soils have been removed during previous development of the site. Therefore, construction and operation of the proposed project would not result in substantial risks to life or property as a result of being located on expansive soils. Impacts would be less than significant, and no further discussion is warranted in the EIR.

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?*

No Impact. No septic tanks or alternative wastewater disposal systems are included as part of the proposed project; therefore, no impact would occur. No further discussion is warranted in the EIR.

VII. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

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

Potentially Significant Impact. Implementation of the proposed project’s various elements would generate greenhouse gas (GHG) emissions, primarily associated with off- and on-road equipment use. While the proposed project would result in no new berthing space, it would replace and improve facilities that would increase the efficiency of operations and allow for newer and larger Navy vessels to be accommodated, which may change operational activities long-term compared to existing conditions. These changes in GHG emissions could potentially, either directly or indirectly, have a significant impact on the environment by exceeding established thresholds for GHG emissions. Further discussion is warranted in the EIR. In addition, the EIR will consider the physical effects of climate change on the proposed project, including an analysis on sea level rise. The sea level rise analysis will identify any areas of potential impacts due to potential future increases in mean sea level rise (temporary coastal flooding, and permanent inundation) and if the project exacerbates potential impacts on the environment resulting from sea level rise or associated events (e.g., coastal flooding, wave overtopping, erosion, etc.).

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

Potentially Significant Impact. The District has enacted a variety of policies and plans to reduce GHG emissions as part of its Climate Action Plan, including the implementation of shore power, equipment and truck replacement/retrofits, vessel speed reductions, and the Clean Truck Program. Implementation of the proposed project could increase GHG emissions during project construction and operations. Therefore, further discussion is warranted in the EIR.

VIII. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

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

Less-than-Significant Impact. The proposed project would use heavy equipment to dredge sediments and would require demolition activities for several project elements, including Project Elements 1 (Pride of San Diego Drydock Dredging and Moorage), 4 (Pier 3 South Nearshore Dredging), 10 (Central Tool Room Demolition and Reconstruction), 11 (New Production Building), 12 (Administration Office Building), and 13 (Pier 1 Restroom Renovation and/or Demolition). Construction-related hazardous materials would be used

during project construction, including fuel, solvents, paints, oils, and grease. The proposed project would be required to comply with federal, state, and local regulations for the routine transport, use, and disposal of any hazardous materials. These regulations include the Resource Conservation and Recovery Act (RCRA); U.S. Department of Transportation (DOT) Hazardous Materials Regulations (Code of Federal Regulations [CFR] Title 49); California Health and Safety Code; and San Diego County Code, Title 6, Division 8, in combination with construction BMPs that would be implemented during project construction. Any accidental release of these materials due to spills or leaks would be cleaned up in the normal course of business, consistent with the above-mentioned regulations. Once construction is completed, operations would remain similar to existing conditions and the routine transport, use, and disposal of any hazardous materials would continue to occur in compliance with the above-mentioned federal, state, and local regulations. Therefore, impacts associated with the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant, and further discussion in the EIR is not warranted.

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?

Potentially Significant Impact. A previous site assessment (Anchor QEA LLC 2016) indicates that copper, mercury, high-molecular weight polycyclic aromatic hydrocarbons, total polychlorinated biphenyls, and tributyltin may be present in sediment within portions of the project site. The presence of these hazardous materials could create a significant hazard to the public or the environment if they were to be disrupted during construction activities and released into the environment. Therefore, impacts are potentially significant, and further analysis is warranted in the EIR.

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

Less-than-Significant Impact. No existing public schools have been identified within one-quarter mile of the project site. The closest public school to the project site is Perkins Elementary School, approximately one-half mile to the northwest across SR-75. As such, project construction and operation would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts would be less than significant, and no further analysis is warranted in the EIR.

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?

Potentially Significant Impact. Based on a review of the California Department of Toxic Substances Control (DTSC) database (EnviroStor), it was determined that the project site is not included on a list of hazardous material sites (DTSC 2018). The State Water Resources Control Board (SWRCB) database (GeoTracker) identifies two sites with closed cases and two sites with open cases. The closed sites consist of a cleanup program case (Case #H09689-001) and one closed leaking underground storage tank cleanup site (Case #H09689-002) on the landside portion of the project site. The open cases include one site within the San Diego Bay, a shipyard sediment site (Case #2090005) near Pier 3 where the proposed Pier 3 mooring dolphin would be constructed, and a sediment delineation investigation (Case # 2090088) near the Pride of San Diego Drydock (SWRCB 2018). Given the open status of the two cases within the Bay, as well as the past presence of onsite contamination associated with the two closed cases, the potential exists for the proposed project to result in a significant hazard to the public or the environment. This is considered a potentially significant impact, and further discussion is warranted in the EIR.

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

Less-than-Significant Impact. The project site is approximately 3 miles south of San Diego International Airport (SDIA) and 3.25 miles east of Naval Air Station (NAS) North Island. The project site is not within any accident potential zones for SDIA; however, it is within Review Area 2 of the SDIA Airport Influence Area, per the Airport Land Use Compatibility Plan (ALUCP) (SDIA 2014). The proposed project structures are similar in height as other structures in the project area. The San Diego County Regional Airport Authority is currently preparing the ALUCP for NAS North Island; therefore, it was not available for review. In accordance with Federal Aviation Regulations, Part 77, the Federal Aviation Administration (FAA) would be notified at least 45 days prior to construction because of the proximity of the site to a navigation facility. There are no other airports in the vicinity of the project site that could be affected by the proposed project. No further discussion of this issue is warranted in the EIR.

- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. As described under question VIII.e, the project site is over 3 miles from the closest private airstrip, NAS North Island. Therefore, no hazard impacts related to private airstrips would occur with implementation of the proposed project, and no further discussion is warranted in the EIR.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less-than-Significant Impact. Emergency response and evacuation is the responsibility of the police and fire service providers, as detailed in Section XIV, *Public Services*. The proposed project would replace aging structures, improve existing infrastructure, increase space utilization and increase efficiency of operations. These improvements would allow for newer and different classes of vessels to be moored and repaired on site; however, these changes are not expected to significantly alter existing site use or throughput. Additionally, all the proposed landside improvements would occur entirely within BAE's leasehold and would not extend off site, where they would potentially interfere with emergency response. As such, proposed project construction or operation would not impair implementation of or physically interfere with an approved emergency response plan.

The proposed project would be required to comply with applicable requirements set forth by the County of San Diego Office of Emergency Services (OES) Operational Area Emergency Plan, San Diego Harbor Police Department, City of San Diego Police Department, and City of San Diego Fire Department. OES coordinates emergency response at the local level in the event of a disaster, including fires. This emergency response coordination is facilitated by the Operational Area Emergency Operations Center and responding agencies to the proposed project site: the City of San Diego Police and Fire Departments and San Diego Harbor Police Department. Because the proposed project would not result in any changes to access in the surrounding area, impacts would be less than significant, and no further discussion is warranted in the EIR.

- h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

No Impact. The City of San Diego is subject to both wildland and urban fires due to its climate, topography, and native vegetation (City of San Diego 2015). The extended drought characteristic of the region's Mediterranean climate and increasingly severe dry periods associated with global warming result in large areas of dry native vegetation that provide fuel for wildland fires. State law requires that all local jurisdictions identify very high fire hazard severity zones (VHFHSZ) within their areas of responsibility (California Government Code Section 51175–51189). Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

According to the VHFHSZ Maps prepared by the City in collaboration with the California Department of Forestry and Fire Protection, the project site is not within or adjacent to wildland fire hazard area (City of

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San Diego 2009). The project site is located on San Diego Bay, near downtown San Diego, and is covered with impermeable surfaces. There are no wildlands or heavily vegetated areas in proximity to the project site, and, as such, replacement of aging structures, improvement to existing infrastructure, and increased efficiency of operations would not exacerbate the potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impacts would occur, and no further discussion is warranted in the EIR.

IX. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Violate Regional Water Quality Control Board water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater discharge such that there would be a net deficit in the aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within 100-year flood hazard area structures that would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Cause inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

a. Violate Regional Water Quality Control Board water quality standards or waste discharge requirements?

Potentially Significant Impact. The potential impacts of construction activities on water quality generally concern sediments, turbidity, and pollutants associated with sediments. Construction-related activities that expose and move soils are responsible primarily for sediment releases and associated turbidity impacts on water quality. The proposed project would involve soil disturbance from activities such as dredging in the Bay and utility work, as well as grading and repaving related to building demolition and construction. Demolition includes removal of existing pavement, structures, mooring dolphins, concrete piles, and any utilities. Construction activities also include repaving the project site with asphalt concrete pavement. These project activities could be impacted by wind and rain leading to erosion of onsite soil and could increase the amount of suspended solids discharged in storm flows. Removal and replacement of the concrete piles would also result in suspended solids in the Bay during these activities. Other pollutants of concern are toxic chemicals from heavy equipment or construction-related materials. Non-sediment contaminants that could enter runoff from the construction site include metals, petroleum products, and trash. Concrete/asphalt and sanitary wastes are other common sources of potentially harmful materials on construction sites. Wash water from equipment and tools and other waste disposed of or spilled on the construction site can lead to seepage of pollutants into watercourses and groundwater. Also, construction chemicals may accidentally spill into watercourses. The impact of toxic construction-related materials on water quality would vary, depending on the quantity, duration, and timing of activities. All of these potential construction-related contaminants could contribute to the degradation of water quality. In-water construction work associated with the proposed project may result in direct discharges into the Bay. During project operations, newer and larger classes of vessels could be accommodated at the site, which would potentially result in changes to ship repair activities and use of associated chemicals. Because there is a potentially significant impact related to water quality during construction and operation, further discussion is warranted in the EIR.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater discharge such that there would be a net deficit in the aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less-than-Significant Impact. Because of the proposed project's proximity to the Bay, groundwater at the project site is saline from saltwater intrusion, and, therefore, it is not used as a groundwater supply source or for recharge. Consequently, the proposed project would not impact the groundwater table level or recharge activities. Impacts related to lowering a groundwater table and interfering with groundwater recharge would be less than significant, and no further discussion of this subject is warranted in the EIR.

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 substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on or off site?

Less-than-Significant Impact. The proposed project would include the redevelopment of 5,000 square feet of impervious surface collectively, on an existing site of 10,000 square feet of impervious surfaces. While the proposed project would replace aging structures and add a new 3-story production building with a 16,475-square-foot footprint, the impervious surfaces associated with the site would remain consistent with existing conditions because the majority of the site is currently impervious. The new building would replace existing impervious surfaces. The proposed project would increase space utilization and increase efficiency of operations, but would not substantially alter the existing drainage pattern of the site as the project site would continue to discharge to the Bay and would not increase the rate or amount of surface runoff. Also, the proposed project would be required to comply with the District's Municipal Stormwater Permit, Article 10 (Stormwater Management and Discharge Control Ordinance), and the JRMP. The proposed project is considered a priority development project (PDP) and is required to implement pollutant control BMPs, following the hierarchy described in the District's BMP Design Manual (retention, partial

retention with biofiltration, biofiltration, or flow-through with participation in an Alternative Compliance Program). Stormwater pollutant control BMPs are engineered facilities that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), biofilter, and/or provide flow-through treatment of stormwater runoff generated on the project site. Minimum BMPs consistent with the District BMP Design Manual require the use of site design BMPs, source control, and pollutant control BMPs. Potential increases in peak flows for storm events would be managed through the use of retention BMPs for stormwater runoff generated on the project site. The JRMP requires a post-construction Storm Water Quality Management Plan be prepared for all PDPs to identify the project-specific design BMPs and source control and pollutant control BMPs applicable to the project. Impacts would be less than significant, and no further analysis is warranted in the EIR.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site?

Less-than-Significant Impact. Refer to question IX.c, above. The impervious surfaces associated with the site would remain consistent with existing conditions as the majority of the site currently consists of impervious surfaces. As such, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. In addition, the project site discharges directly to the Bay, further reducing the potential to result in flooding on or off site. Impacts would be less than significant, and no further analysis is warranted in the EIR.

e. 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?

Potentially Significant Impact. As previously discussed under question IX.a, the potential construction-related contaminants (e.g., sediments, turbidity, metals, petroleum products, trash, concrete/asphalt, and sanitary wastes) could contribute to the degradation of water quality during construction activities. In-water construction work associated with the proposed project may result in direct discharges into the Bay. Similarly, changes in operations could result in an increased usage of chemicals associated with ship repair activities. As such, the proposed project would have the potential to provide substantial additional sources of polluted runoff. Impacts would be potentially significant, and further analysis is warranted in the EIR.

Refer to question IX.c, above. The impervious surfaces associated with the site would remain consistent with existing conditions as the majority of the site currently consists of impervious surfaces. The proposed project site would continue to discharge directly to the Bay. As such, the proposed project would not substantially increase the amount of surface runoff that could exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant, and no further analysis is warranted in the EIR on this portion of the threshold.

f. Otherwise substantially degrade water quality?

Potentially Significant Impact. As discussed under question IX.a, above, construction and operation of the proposed project would have the potential to directly introduce pollutants into surface bodies of water (or storm drains), causing significant water quality impacts. Therefore, further analysis of this issue is warranted in the EIR.

g. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other hazard delineation map?

No Impact. Although the proposed project site is located within an area that is designated as “100 Year Floodplain” by the Federal Emergency Management Agency (FEMA 2012), the proposed project does not involve the construction of any housing or other type of structure suitable for human habitation. Therefore, no impacts related to housing within a 100-year flood hazard area would occur, and no further discussion is warranted in the EIR.

h. Place within 100-year flood hazard area structures that would impede or redirect flood flows?

Potentially Significant Impact. The proposed project involves the maintenance, repair, and replacement of waterfront infrastructure within San Diego Bay, including the addition of new or replaced buildings in potentially modified locations. The new and replacement structures would be constructed within a 100-year flood hazard area and could impede or redirect flood flows; therefore, further discussion of this issue is warranted in the EIR.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Less-than-Significant Impact. Dam failures are rated as a low-probability, high-loss event. Only two major dam failures have been recorded in San Diego County. These occurred in 1916 and were caused by a flood event (County of San Diego 2017). The project site is not identified within a risk zone of a potential dam failure (County of San Diego 2017). No areas in the San Diego region are in a levee flood protection zone (California Department of Water Resources 2018). Thus, it is highly unlikely that the proposed project would expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam. Impacts would be less than significant, and no further analysis is warranted in the EIR.

j. Cause inundation by seiche, tsunami, or mudflow?

Less-than-Significant Impact. Although the project site is within a designated high-risk zone for a tsunami, the likelihood that an event would occur during the 5-year construction period is low. If such an event were to occur, the likelihood that it would affect the project site is also low. The project site is located on the Bayfront but approximately 2 miles from the Pacific Ocean. Coronado is located between the site and the ocean. Moreover, the project site is located at approximately 8 feet MLLW. Therefore, considering the distance from the ocean, the buffering provided by landmass, and the height above sea level, the potential for hazards associated with direct wave action in the event of a storm surge, tsunami, or seiche is low. Conditions under the operational phase of the proposed project would be similar to the existing conditions and would not increase the potential of site inundation. Although inundation from a tsunami or seiche is possible, it is unlikely; if it were to occur, damage would most likely be limited to ground-floor water damage. People would be given warning to evacuate the project site by the West Coast and Alaska Tsunami Warning Center, which monitors earthquakes and issues tsunami warnings when a tsunami is forecast to occur. Consequently, although inundation from a tsunami or seiche is reasonably foreseeable, any associated impacts would be less than significant, and no further analysis is warranted in the EIR.

The potential for large-scale slope instability at the site that could lead to mudflow is not present at the project site. The project site is located on flat topography. Impacts would be less than significant, and no further discussion is warranted in the EIR.

X. Land Use and Planning

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a.	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

a. Physically divide an established community?

No Impact. The proposed project would replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations within an existing ship repair yard on San Diego Bay. The proposed project would not expand the physical landside boundaries of the ship repair yard or develop areas outside of its current landside boundaries and expand into any adjacent communities. All the landside improvements would occur entirely within BAE Systems' leasehold. Therefore, the project would not physically divide an established community, and no impacts would occur. No further analysis is warranted in the EIR.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The PMP is the guiding land use policy document for all areas under the District's jurisdiction. The proposed project is located within Planning District 4, which has been identified as the only area in the entire San Diego region with an established waterfront industrial shipping operation. The proposed project is required to be consistent with the Public Trust Doctrine and the Port Act and applicable provisions of the California Coastal Act. Three project elements are located either partially (Project Elements 1 and 8) or entirely (Project Element 5) within State Lands Commission (SLC) jurisdiction and are outside of the District's jurisdiction, requiring approval from SLC and the California Coastal Commission. Therefore, further analysis is needed to determine if the proposed project would have the potential to result in inconsistencies with the California Coastal Act, Port Master Plan, and any other relevant plans that have jurisdiction over the project.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Potentially Significant Impact. As discussed under question IV.f, the proposed project would occur outside the boundaries of the City of San Diego MHPA, as designated in the City's MSCP Subarea Plan. Additionally, no designated MHPA is present adjacent to the project site. As such, the proposed project would not conflict with a habitat conservation plan or natural community conservation plan.

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The District and the U.S. Navy Southwest Division maintain the INRMP, which aims to ensure the long-term health, recovery, and protection of San Diego Bay's ecosystem. In-water work associated with the proposed project has the potential to result in significant impacts on biological resources of the San Diego Bay. Therefore, development of the proposed project will be reviewed with the goals and intent of the INRMP and a more detailed analysis will be provided in the EIR.

XI. Mineral Resources

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

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

No Impact. The project site, an area characterized by marine-related industrial activities, does not contain any known mineral resources. In addition, the project site is underlain by artificial fill material. No commercial mining operations exist on the project site or in the immediate vicinity. The project site and the surrounding area are not designated or zoned as land with the availability of mineral resources. In addition, the project site does not contain aggregate resources and is not located in a mineral resource zone that contains important resources. In accordance with guidelines established by the State Mining and Geology Board, mineral deposits in western San Diego County have been classified into Mineral Resource Zones (MRZ). According to the Conservation Element of the City of San Diego's General Plan (City of San Diego 2008b), the project site is mapped within the MRZ-1 classification. The MRZ-1 classification identifies areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that there is little likelihood for their presence (City of San Diego 2016a) Therefore, the proposed project would not result in a loss of known mineral resources. No impact would occur, and no further analysis is warranted in the EIR.

- b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact. See question XI.a. The project site is underlain by artificial fill material. The PMP does not identify any mineral resources in the area or designated plans for mineral resource extraction. The project site and the surrounding area do not contain locally important mineral resources. Therefore, implementation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site, and no impact would occur. No further analysis is warranted in the EIR.

XII. Noise

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. The closest noise-sensitive receptors to the proposed project are homes, schools, and a park. Although these receptors are relatively far from the project site (more than 1,000 feet), the potential exists for project construction to result in significant impacts due to the proposed high-intensity construction activities (i.e., pile driving), as well as limited 24-hour construction activities (i.e., dredging) that would occur partly outside of the daytime hours typically permitted by the City of San Diego. Noise levels during project construction will be analyzed in the EIR and evaluated relative to the construction noise standards provided in the City of San Diego Municipal Code.

Due to the project's waterfront location and the proposed in-water construction activities, there is also the potential for the proposed project to result in significant noise impacts on sensitive biological resources (birds, fish, and/or marine mammals). Therefore, noise levels (including underwater noise [hydroacoustic] levels) will also be evaluated for biological resources and addressed within the EIR's *Biological Resources* section.

Once construction is completed, the improvements would allow BAE Systems to improve operational efficiency and service newer and different classes of vessels that cannot be accommodated under existing conditions. As a result, the total number of ship repair days per year at the site would increase. However, the changes would not lead to additional simultaneous vessel work and would not increase the number of

people on-site. In fact, the worst-case (largest) total on-site vessel crew and labor force size would decrease under the proposed project. Consequently, the general types of operational activities (i.e., vessel service and repair) at the project site would remain the same as those that currently occur, and the overall intensity of the operations would not increase. This, combined with the large distances to the nearest noise-sensitive receptors, means that operational noise levels (including BAE-related traffic noise in the surrounding community) would not change appreciably at the nearest receptors, and the operational noise impacts would be less than significant. As a result, a quantitative analysis of operational noise levels is not necessary and a brief qualitative discussion will be included in the EIR.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The primary source of groundborne vibration during project construction would be pile driving. Lesser vibration-generating activities would include demolition, dredging, and excavation. Although perceptible groundborne vibration or noise generated by project construction would most likely not propagate to surrounding residential uses or other sensitive receptors, the possibility of vibration-related damage to nearby buildings presents a potentially significant impact. Therefore, predicted vibration levels during project construction will be evaluated in the EIR.

As discussed under question XII.a, operational activities at the project site would remain essentially unchanged from those that currently occur. As a result, operational groundborne vibration levels would not change appreciably and would remain imperceptible at the nearest sensitive receptors due to the large propagation distances. Therefore, operational vibration impacts would be less than significant, and no further analysis of operational groundborne vibration is warranted in the EIR.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less-than-Significant Impact. As described under question XII.a, the proposed project would not increase permanent ambient noise levels because long-term operational activities would not change substantially. The general types of operational activities (i.e., vessel service and repair) at the project site would remain the same as those that currently occur, and the overall intensity of the operations would not increase. This, combined with the large distances to the nearest noise-sensitive receptors, means that operational noise levels (including BAE-related traffic noise in the surrounding community) would not change appreciably at the nearest receptors. As a result, impacts would be less than significant, and a quantitative analysis of operational noise levels is not necessary. A brief qualitative discussion will be included in the EIR.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As described under question XII.a, construction-related activities could result in a temporary or periodic increase in ambient noise levels. Therefore, impacts from construction noise are potentially significant, and further analysis is warranted in the EIR.

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 expose people residing or working in the project area to excessive noise levels?

No Impact. The closest air facilities to the project site are SDIA and NAS North Island. SDIA is a public airport approximately 3 miles from the project site with an adopted airport land use plan. NAS is a private airport approximately 3.25 miles from the site without an adopted airport land use plan. Based on the noise contour maps for both of these facilities (Ricondo & Associates 2014 and Onyx Group 2011, respectively), the project site is outside of their designated noise contours (the minimum noise contour value is 60 community noise equivalent level decibels). In addition, the proposed project would not change the operations of SDIA or NAS North Island or otherwise affect the existing aircraft noise environment in the project vicinity. The proposed project also would not create any new noise-sensitive receptors that could

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be affected by aircraft noise. Therefore, the proposed project would not expose people residing or working in the project area to excessive airport noise levels, and no further discussion is warranted in the EIR.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As described under issue XII.e, the project site is outside of the designated noise contours for NAS North Island. Therefore, no impacts related to private airstrips would occur with implementation of the proposed project, and no further discussion is warranted in the EIR.

XIII. Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

- a. Induce substantial 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)?**

Less-than-Significant Impact. The proposed project would not construct any homes or commercial uses, or extend roads or other infrastructure that could induce substantial population growth. Construction activities would result in the generation of temporary construction jobs. However, the additional jobs are expected to be filled by people who currently live in the San Diego region. The jobs would not result in the relocation of any population. In addition, none of the operational changes associated with the proposed project, which are targeted to improving efficiency of operations, would create new jobs. Therefore, the proposed project would not directly or indirectly induce substantial population growth through the creation of new homes or businesses in the San Diego region. Impacts would be less than significant, and no further discussion is warranted in the EIR.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The project site is a working ship repair yard on San Diego Bay and does not include residential housing. As such, no housing would be displaced with implementation of the proposed project. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

- c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?**

No Impact. The project site is a working ship repair yard on San Diego Bay and does not contain any permanent residents. The proposed project involves the replacement of aging structures, improvement of existing infrastructure, increased space utilization, and increased efficiency of operations. Implementation of the proposed project would not displace people or require the construction of replacement housing elsewhere. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

XIV. 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 Incorporated	Less-than-Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

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:

a. Fire protection?

Less-than-Significant Impact. The project site is served by the City of San Diego Fire-Rescue Department (SDFD) and San Diego Harbor Police Department (HPD) for fireboat operations. The proposed project would replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations. Construction activities and operational changes associated with the proposed project would not generate new or increased demands on fire protection. Therefore, the proposed project would not result in increased demand that would require new or physically altered fire protection facilities; impacts would be less than significant. No further discussion is warranted in the EIR.

b. Police protection?

Less-than-Significant Impact. The San Diego HPD provides police protection services to the project site. The proposed project would replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations at the project site. Construction activities and operational changes associated with the proposed project would not generate new or increased demands on police protection. Therefore, the proposed project would not result in increased demand that would require new or physically altered police protection facilities; impacts would be less than significant. No further discussion is warranted in the EIR.

c. Schools?

No Impact. Physical impacts on school facilities and services are typically associated with population immigration and growth, which increase the demand for schools and result in the need for new or expanded facilities, the construction of which may result in physical impacts on the environment. As discussed above under question XIII.a, the proposed project would have a less-than-significant effect on population growth. Jobs generated during construction of the proposed project would be drawn from the local workforce, and no new jobs would be generated during project operations. Therefore, the proposed project would not result in increased demand that would require the need for new or physically altered school facilities; no impact would occur. No further discussion is warranted in the EIR.

d. Parks?

Less-than-Significant Impact. The project site is in an area consisting predominantly of industrial and maritime uses. No park facilities are within or immediately adjacent to the project site that would be physically affected. As discussed above under question XIII.a, the proposed project would have a less-than-significant effect on population growth. Jobs generated during construction of the proposed project would be drawn from the local workforce, and no new jobs would be generated during project operations. Therefore, the proposed project would not result in an increased demand requiring the need for new or physically altered park facilities, and any related impact would be less than significant. No further discussion is warranted in the EIR.

e. Other public facilities?

No Impact. The proposed project would not result in adverse impacts on other public facilities. As discussed above, physical impacts on public services are usually associated with in-migration and population growth, which increase the demand for public services and facilities. The proposed project would not increase the local population. Although additional employees are anticipated during construction, they are not expected to increase the use of existing public services and facilities to the extent that new or expanded facilities would be necessary. Therefore, the proposed project would not result in increased demand that would require the need for new or physically altered public facilities. No impact would occur, and no further discussion in the EIR is warranted.

XV. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

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?*

Less-than-Significant Impact. An increase in the use of existing parks and recreational facilities typically results from an increase in the number of housing units or residents in an area. The proposed project would not result in an increase in the number of housing units or residents in the project vicinity. As discussed above under question XIV.d, the project site is in an area consisting predominantly of industrial and maritime uses, and no park facilities are within or immediately adjacent to the project site. Although additional employees are anticipated during construction, they are not expected to heavily use the existing neighborhood or regional parks or any other recreational facilities. In addition, none of the operational changes associated with the proposed project would create new jobs. Impacts would be less than significant, and no further discussion is warranted in the EIR.

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?*

No Impact. The proposed project does not include the development of any recreational facilities. The proposed project would replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations at the project site. In addition, as described under question XV.a, the project would not require the expansion of existing recreational facilities. Therefore, the proposed project would not require construction or expansion of recreational facilities that might have an adverse physical effect on the environment. As a result, no impact would occur, and no further discussion is warranted in the EIR.

XVI. Transportation/Traffic

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation systems, including but not limited to intersections, streets, highways and freeways, pedestrians and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the country congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Result in inadequate parking supply?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation systems, including but not limited to intersections, streets, highways and freeways, pedestrians and bicycle paths, and mass transit?**

Potentially Significant Impact. Implementation of the various proposed project elements would generate truck trips (materials/equipment delivery and waste hauling) and worker trips that would access the project site. Increased vehicle trips associated with the proposed project could potentially conflict with local policies that measure the effectiveness of the circulation system. A traffic impact study will be prepared for the proposed project and potential traffic impacts will be analyzed in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the country congestion management agency for designated roads or highways?

No Impact. The designated congestion management agency for the San Diego region is SANDAG. In 2009, the San Diego region elected to be exempt from the state Congestion Management Plan and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. *San Diego Forward: The Regional Plan* (Regional Plan), the region's Regional Transportation Plan and Sustainable Communities Strategy, meets the requirements of 23 CFR 450.320 (SANDAG 2015).

Therefore, to determine if the proposed project would conflict with an applicable congestion management program, the proposed project was reviewed for consistency with the Regional Plan, which is a land use and transportation planning document that discusses land use policy at a very general level. The Regional Plan mostly incorporates the land use policies of local jurisdictions and focuses on transportation infrastructure and management programs to support those policies. The project does not propose any changes to the existing land or water use designations of the project site or transportation network that could conflict with the Regional Plan. Therefore, no impact would occur, and no further analysis is warranted in the EIR.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Less-than-Significant Impact. The project site is approximately 3 miles south of SDIA and 3.25 miles east of NAS North Island. The project site is within Review Area 2 of the SDIA Airport Influence Area, per the ALUCP (Airport Land Use Commission 2014). The San Diego County Regional Airport Authority is currently preparing the ALUCP for NAS North Island; therefore, it was not available for review. The proposed project structures are similar in height as other structures in the project area. In accordance with Federal Aviation Regulations, Part 77, the FAA would be notified at least 45 days prior to construction because of the proximity of the site to a navigation facility. There are no other airports in the vicinity of the project site that could be affected by the proposed project. Therefore, impacts would be less than significant, and no further discussion of this issue is warranted in the EIR.

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

No Impact. The proposed project does not involve any design modifications to existing street segments or intersections, nor would it change any driveways that provide access to the project site. Additionally, the project site is situated in an area consisting predominantly of industrial and maritime uses. The proposed project would replace aging structures, improve existing infrastructure, increase space utilization, and increase efficiency of operations within an existing ship repair yard on San Diego Bay. The project site would continue to operate as a ship repair yard upon project completion, which is compatible with the surrounding land uses. Therefore, the proposed project does not have the potential to increase traffic hazards to motorists or create an incompatible traffic-related use. No impacts would occur, and no further discussion of this issue is warranted in the EIR.

e. Result in inadequate emergency access?

No Impact. Construction of the proposed project would not require any temporary closures of public roadways or driveways that could impede emergency access either within the District's jurisdiction or along streets under the jurisdiction of the City of San Diego. Access to the site from E. Belt Street would be maintained throughout project construction. Additionally, there are no components of the proposed project that would result in inadequate emergency access during project operations. No impacts on emergency access would occur, and no further discussion of this issue is warranted in the EIR.

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less-than-Significant Impact. The project site is an operating ship repair yard with restricted access. The proposed project would not increase the number of permanent employees that could increase the use of alternative transportation facilities serving the project site. Additionally, there are no public transit, bicycle, or pedestrian facilities within the project site, nor would the proposed project result in changes to any offsite alternative transportation facilities. Therefore, implementation of the proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Impacts would be less than significant, and no further discussion is warranted in the EIR.

g. Result in inadequate parking supply?

Potentially Significant Impact. BAE Systems currently maintains a parking capacity of approximately 1,572 spaces with an option of 200 additional parking spaces for employees, customers, and visitors (BAE Systems pers. comm.). Construction of the various project elements would occur over several phases, with the peak of construction occurring between March and April 2020 when construction of Project Elements 3 (Fender System Repair and Replacement), 4 (Pier 3 South Nearshore Dredging), and 5 (Pier 3 Mooring Dolphin) would overlap. At the peak of project construction, approximately 21 daily construction workers would access and park at the project site. As such, there is a potential that the project site would not be able to accommodate parking for construction worker vehicles. The lack of sufficient parking during construction would be a potentially significant impact and further analysis is warranted in the EIR.

BAE Systems currently has 1,808 individuals reporting to the ship repair yard across three 8-hour shifts. These individuals consist of a mix of BAE personnel, Navy personnel, and customers. During project operations, none of the proposed project elements would increase the number of permanent employees on site. Project Elements 1 (Pride of San Diego Drydock Dredging and Moorage), 4 (Pier 3 Nearshore Dredging), and 5 (Pier 3 Mooring Dolphin) would allow BAE Systems to improve operational efficiency and servicing of newer and different classes of vessels. With the addition of a supplemental mooring dolphin and near-shore dredging at Pier 3, the ship repair yard would be able to moor larger naval and commercial vessels at the Pier 3 South berth. Based on the changes to the mooring capacity at Pier 3, the total number of employees on site could change depending on the specific ship mix at the site. For example, commercial vessels do not generally carry a large crew, while large naval vessels occasionally do. The specific ship mix that the facility could support is dependent upon the size of the vessel moored and its effects on adjacent berths. When a larger navy ship is moored at Pier 3 South, the potential berthing capacity of the site would be reduced by two vessels, resulting in a corresponding reduction in crew and labor compared to existing conditions. As such, because the proposed project would not add any new permanent employees and, at times, would reduce the number of employees at the ship repair yard compared to existing conditions, project operations would not result in an inadequate parking supply that could have secondary environmental effects. Therefore, the proposed project's impact on parking supply during operations would be less than significant. However, operation-related parking will be discussed in the EIR.

XVII. Tribal Cultural Resources

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 Incorporated	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

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:

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

No Impact. Pursuant to Assembly Bill (AB) 52, tribes can request to be notified of projects in particular geographies. However, at present, no Native American tribes have requested consultation for environmental review projects under CEQA within the District's jurisdiction. Tribal Cultural Resources (TCRs) are a defined class of resources under Section 1 of AB 52. TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a tribe.

A search of the Native American Heritage Commission's Sacred Lands File conducted on August 13, 2018, revealed that there are no known Sacred Lands in or near the project area. A record search conducted on April 25, 2017, by South Coastal Information Center located on the San Diego State University campus revealed that no cultural resources have been recorded in the project area. Furthermore, the project area is entirely constructed of fill, and historic maps indicated that the shoreline was located east of the project area in 1857. Therefore, the proposed project would not cause a substantial adverse change in the significance of a TCR, and no impacts would occur. No further discussion is warranted in the EIR.

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.

No Impact. Pursuant to PRC Section 21080.3.1 (AB 52), California Native American tribes traditionally and culturally affiliated with the project area can request notification of projects in their traditional cultural territory. No tribes have requested consultation for projects subject to CEQA within the District's jurisdiction.

The District has determined that no impacts would occur on TCRs given the lack of substantial evidence and criteria set forth in subdivision (c) of PRC Section 5024.1. However, in the event that a TCR is unexpectedly identified during the course of the proposed project, and the District determines that the project may cause a substantial adverse change to a TCR, the District will rely on measures described in the Public Resources Code that, if the District determines to be feasible, may avoid or minimize the significant adverse impacts (PRC Section 21084.3 (b)).

XVIII. Utilities and Service Systems

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h.	Result in the wasteful, inefficient, or unnecessary use of energy or require or result in the construction of new energy system infrastructure or the expansion of existing infrastructure, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less-than-Significant Impact. Wastewater treatment service is provided to the project site by the Metropolitan Sewerage System, which is owned and operated by the City of San Diego Public Utilities Department's (PUD's) Wastewater Branch. The Metropolitan Sewerage System serves the City's water customers as well as 12 cities and agencies with a service area of approximately 450 square miles and service population of approximately 2.2 million. The Metropolitan Sewerage System collects, treats, and disposes of approximately 180 million gallons per day (mgd) of wastewater. Planned improvements will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year

2050, when nearly 340 mgd of wastewater would be generated (City of San Diego 2016b). Three treatment plants treat wastewater generated in the Metro System, including the North City Water Reclamation Plant, South Bay Water Reclamation Plant, and Point Loma Wastewater Treatment Plant. The Point Loma plant currently treats the wastewater generated by the project site and has a treatment capacity of 240 mgd and a peak wet weather capacity of 432 mgd (City of San Diego 2016b).

As discussed above under question XIII.a, the proposed project would not increase population; the jobs generated during project construction would be drawn from the local workforce that is currently served by existing wastewater treatment facilities, and no new jobs would be generated during project operations. Project-generated wastewater requiring treatment would be limited to onsite construction personnel and activities. These activities, primarily limited to personal wastewater, would not generate a significant amount of new wastewater requiring treatment. Such minimal wastewater generated would not exceed the requirements of any wastewater treatment facilities. Additionally, none of the operational changes associated with the proposed project would generate new sources of wastewater. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less-than-Significant Impact. As discussed above under question XVIII.a, the proposed project would generate minimal wastewater during construction. Additionally, the proposed project would replace the existing potable water feeds. None of the operational changes associated with the proposed project would generate new sources of water or wastewater or the expansion of these existing utilities. Similarly, water use would increase minimally during project construction, and no new sources of water use are anticipated during project operations compared to existing conditions. Therefore, the proposed project would not substantially increase the amount of water or wastewater requiring treatment, and would not require the need for new or improved water or wastewater treatment facilities. Impacts would be less than significant, and no further discussion is warranted in the EIR.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less-than-Significant Impact. The proposed project would not result in a change to existing stormwater flows or drainage patterns, or result in other stormwater discharges during construction that would require new or upgraded stormwater drainage facilities. The proposed project would increase space utilization and increase efficiency of operations, but would not substantially alter the existing drainage pattern of the site because the project site would continue to discharge to the Bay and would not increase the rate or amount of surface runoff as the impervious surfaces would remain similar. Construction of the proposed project would be required to comply with the District's Municipal Stormwater Permit, Article 10 (Stormwater Management and Discharge Control Ordinance), and the JRMP. The proposed project is considered a PDP and is required to implement pollutant control BMPs, following the hierarchy described in the District's BMP Design Manual (retention, partial retention with biofiltration, biofiltration, or flow-through with participation in an Alternative Compliance Program).

As discussed above under question IX.e, during project operations, the impervious surfaces associated with the site would remain consistent with existing conditions because the majority of the site currently consists of impervious surfaces. The proposed project site would continue to discharge directly to the Bay. As such, the proposed project would not substantially increase the amount of surface runoff that could exceed the capacity of existing or planned stormwater drainage systems, requiring the construction of new or expansion of existing storm drain facilities. Additionally, it is anticipated that relevant proposed project elements would incorporate existing BMPs, including the Storm Water Diversion System, or modify/develop project-specific BMPs as appropriate. The diversion system consists of 36 catch basins and associated piping, and secondary containment. Additional system capacity would not be required. Therefore, impacts would be less than significant, and no further analysis is warranted in the EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less-than-Significant Impact. Potable water would be provided to contractors on site during various project activities including demolition activities to limit fugitive dust propagation, concrete preparation and placement, and other general use. Dredge and utility projects do not require potable water use. Approximately 150,000 gallons of water would be required for construction of the proposed project.

The proposed project includes the replacement of the existing Pier 3 restroom facilities requiring the provision of utilities and related infrastructure, including potable water. However, there would not be a substantial change in water use because operations would remain similar to existing operations. In fact, the worst-case (largest) total on-site vessel crew and labor force size would decrease under the proposed project. No other components of the proposed project would require potable water during project operations. Therefore, impacts on water supplies would be less than significant, and no further discussion is warranted in the EIR.

e. 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?

Less-than-Significant Impact. As discussed above in questions XVIII.a and XVIII.b, the proposed project would not generate a substantial amount of new wastewater from construction activities. Additionally, none of the operational changes associated with the proposed project would generate new sources of wastewater. Therefore, the proposed project would not substantially increase the amount of wastewater requiring treatment that would have the potential to affect the wastewater treatment capacity of the Point Loma Wastewater Treatment Plant. Impacts would be less than significant, and no further discussion is warranted in the EIR.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less-than-Significant Impact. Eight of the project elements require demolition of existing structures and disposal of the subsequent debris. The construction waste generated from this demolition would be transported from the site and disposed of at the Miramar Landfill in the city of San Diego or Otay Landfill in the city of Chula Vista. It is anticipated that a minimum of 65 percent of the construction waste would be recycled in accordance with the City of San Diego Construction and Demolition (C&D) Debris Deposit Ordinance. Scrap steel generated during demolition and construction would be handled through BAE Systems' facility scrap recycling program and, therefore, would not be disposed of at a landfill. Additionally, dredged sediment designated for upland disposal would be transported to Otay Landfill in the city of Chula Vista. Furthermore, because the proposed project would not increase the number of employees at the site, none of the operational changes associated with the proposed project would generate new sources of solid waste requiring disposal at Miramar Landfill. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less-than-Significant Impact. When first enacted, AB 939 required every city and county in the state to prepare a Source Reduction and Recycling Element in its Solid Waste Management Plan to identify how each jurisdiction planned to meet mandatory State waste diversion goals of 25% by the year 1995 and 50% by the year 2000. AB 939 also established the California Integrated Waste Management Board, the State agency designated to oversee, manage, and track California's solid waste generation each year. In order to further the goals of AB 939, statewide strategies to achieve a 75% reduction goal by 2020 were established with the adoption of AB 341 in May 2012, the main component of which implemented mandatory commercial recycling by certain businesses and public entities. Additionally, the City of San Diego C&D Debris Deposit Ordinance requires that the majority of construction, demolition, and remodeling projects requiring building, combination, and demolition permits pay a refundable C&D Debris Recycling Deposit and divert at least 65% of their debris by recycling, reusing, or donating usable materials.

Eight of the project elements require demolition of existing structures and disposal of the subsequent debris. The construction waste generated from this demolition would be transported from the site and disposed of at the Miramar Landfill in the city of San Diego or Otay Landfill in the city of Chula Vista. It is anticipated that a minimum of 65 percent of the construction waste would be recycled in accordance with the City of San Diego C&D Debris Deposit Ordinance. Additionally, dredged sediment designated for upland disposal would be transported to Otay Landfill in the city of Chula Vista. Furthermore, because the proposed project would not increase the number of employees at the site, none of the operational changes associated with the proposed project would generate new sources of solid waste requiring disposal at Miramar Landfill. Therefore, the proposed project would have a less-than-significant impact related to compliance with federal, state, and local solid waste statutes and regulations. No further analysis is warranted in the EIR.

h. Result in the wasteful, inefficient, or unnecessary use of energy or require or result in the construction of new energy system infrastructure or the expansion of existing infrastructure, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Project construction would primarily consume diesel fuel through operation of heavy-duty construction equipment, material deliveries, and debris hauling; gasoline associated with worker commutes; and minor amounts of electricity associated with operation of electrically powered construction equipment. Construction-related energy use would represent a small demand on local and regional fuel and electricity supplies that could be easily accommodated by fuel suppliers. Moreover, this demand for fuel would have no noticeable effect on peak or baseline demands for energy. Therefore, construction of the proposed project would not result in a wasteful, inefficient, and unnecessary usage of direct or indirect energy.

However, operational changes associated with the proposed project could result in increased electrical demand from newer and larger classes of vessels being repaired at the site. As such, the proposed project would potentially increase energy use compared to existing conditions once operational. In addition, construction of Project Element 14 (Main Electric Utility Service Update) would require relocating the existing San Diego Gas & Electric electrical main, as well as replacing and upgrading electrical distribution equipment to ensure reliability and fault interruption to protect site infrastructure. Construction of these improvements would have the potential to result in significant environmental effects. Therefore, impacts would be potentially significant, and further analysis of these issues will be provided in the EIR's *Greenhouse Gas Emissions* section.

XIX. Mandatory Findings of Significance

Would the project?	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Does the project have the potential to 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, 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (<i>Cumulatively considerable</i> means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by State CEQA Guidelines, Appendix G.

Would the project:

- a. Does the project have the potential to 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, 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?**

Potentially Significant Impact. In-water work would occur in the Bay, which would cause potential impacts on biological resources such as fish, green sea turtles, and marine mammal species. Therefore, further analysis of the proposed project's potential biological resources is warranted in the EIR.

Regarding cultural resources, the entire project area consists of constructed fill or water. Analysis of historic maps shows that the historic shoreline was located to the east of the project area in 1857; therefore, no native soil is present in the project area. Additionally, although several buildings and structures at the project site that would be physically altered by the proposed project incorporate elements that are 50 years old or older, those buildings and structures have been subject to substantial alteration. As such, these built resources do not maintain historical integrity with respect to a discernable period of potential significance 50 years ago or earlier. Therefore, impacts on cultural resources, would be less than significant, and no further analysis is warranted in the EIR.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***

Potentially Significant Impact. State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. The cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-specific impacts and should be guided by the standards of practicality and reasonableness.

As determined by this Initial Study, there may be potentially significant effects related to air quality, biological resources, paleontological resources, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, and transportation and traffic. Therefore, the project's potential contribution to cumulative impacts related to these resources will be discussed in the EIR.

Given that the project would have no impact on aesthetics, agriculture and forestry resources, cultural resources, geologic hazards and soils, mineral resources, or tribal cultural resources, it was determined that the proposed project would have no potential to result in cumulative impacts related to these resource areas. Further discussion of the cumulative effect on these resources is not warranted in the EIR.

- c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?***

Potentially Significant Impact. Based on the analysis above, the proposed project has the potential to result in significant impacts on air quality, biological resources, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, and transportation and traffic. As such, the project has the potential to result in environmental impacts that could cause substantial adverse effects on human beings, either directly or indirectly. Therefore, further discussion is warranted in the EIR.

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Document Preparation

Consistent with State CEQA Guidelines Section 15063 (d) (6), the following section provides a listing of the persons who prepared this Initial Study and those persons who participated in its review.

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