EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) has been prepared by the San Diego County Regional Airport Authority ("Authority") to address the potential environmental effects of the remediation of the former Naval Training Center (NTC) landfill located within the current boundaries of the San Diego International Airport ("SDIA" or "Airport"). The Authority, the lead agency for the proposed project under the California Environmental Quality Act (CEQA), proposes to conduct the remediation of a former landfill and remove waste materials located on the former NTC property at SDIA in the City of San Diego.

The Authority issued a Notice of Preparation (NOP) of a Draft EIR on May 1, 2007 and held a public scoping meeting at the Airport on June 5, 2007. This Draft EIR ~~has been~~was informed by comments from agencies, local governments, and members of the public from the NOP and public scoping meeting. ~~This~~ The Draft EIR ~~is~~ was ~~being~~ circulated for review to agencies, local governments and interested members of the general public for a period of 45 days. Comments on the adequacy of this Draft EIR ~~must be~~ provided to the Authority by the close of the 45-day public review period ~~in order to be~~are addressed in the Final EIR. During the 45-day public review period, comments on the Draft EIR from agencies, local governments and members of the public ~~may be submitted to~~were accepted by the Authority at the following addresses:

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Note: the Authority ~~will~~ accepts comments submitted by e-mail received through the close of business on the comments due date if the comments: (1) contain less than 2,000 words; and (2) the e-mail comments do not contain any attachments. Any comments on ~~the~~ a Draft EIR containing more than 2,000 words, or which are accompanied by any attachments, must be mailed or delivered in writing to one of the addresses specified at left, or they will not be considered as valid.

PROJECT BACKGROUND

Overview of San Diego International Airport

Located just northwest of the City of San Diego downtown area, SDIA encompasses 661 acres. The Airport has a single, 9,401-foot-long, 200-foot-wide east-west runway (Runway 9/27), making it one of the busiest single-runway commercial airports in the nation. San Diego International Airport's air service continues to grow based upon the growing region's demand for air travel; however, the existing Airport site is severely constrained by its location. The Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy boat channel and Liberty Station to the west, the Marine Corps Recruit Depot (MCRD) to the north, and Pacific Highway and Interstate 5 (I-5) to the east. Land in the vicinity of the Airport is densely developed and has high developable value due to the Airport's location less than two miles from downtown San Diego.

San Diego International Airport was dedicated as the San Diego region's municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of Supervisors. Port District purview included ownership and operation of the Airport. Assembly Bill 93 established the San Diego County Regional Airport Authority Act in 2002, which created the Authority as a local entity of regional government to oversee SDIA's operations. Governor Davis signed Senate Bill 1896 into law in August 2002, which amended Assembly Bill 93 regarding the selection and appointment of Authority Board members. On January 1, 2003, the operation of SDIA was transferred to the Authority from the Port District as required by the San Diego County Regional Airport Authority Act. Although the Port District still has ownership of the State Tidelands that underlie SDIA, the transfer from the Port District shifted planning responsibilities, operation, and control of the Airport to the Authority. The Authority Board is responsible for all policy and planning decisions for SDIA and serves as the lead agency in accordance with the CEQA.

Project Site

The landfill site is located within the current boundaries of SDIA, immediately west of Terminal 2 West (T2 West), north of Spruance Road, east of McCain Road and the boat channel, and south of the MCRD, Runway 9/27, and Taxiway B. The site was formerly owned and used by the U.S. Navy (which includes the U.S. Marine Corps) between 1923 and 1989. The U.S. Marine Corps operated a municipal landfill on the site between 1950 and 1971. Burned waste (burn ash [BA]) and municipal solid waste (MSW) were deposited on the site. The landfill was reportedly covered with soil after it ceased receiving waste in 1971.

The landfill site was transferred from the MCRD to the NTC in 1975. In 1997, NTC closed in accordance with a U.S. Navy Base Realignment and Closure Plan. The Base Realignment and Closure Plan consisted of two main elements: (1) the NTC Reuse Plan and (2) an associated Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The NTC Reuse Plan designated the landfill site for airport uses. The NTC Reuse Plan and EIS/EIR were approved by the City of San Diego (the local Reuse Authority) in 1998, and the 52-acre parcel encompassing the former landfill site was transferred to the Port District (which at the time owned and operated SDIA) in 1999. In 2003, responsibility for the property was transferred from the Port District to the Authority in accordance with the San Diego County Regional Airport Authority Act described above.

Maintenance of the landfill cover is conducted in compliance with requirements of Regional Water Quality Control Board (RWQCB) Order No. 97-11, "General Waste Discharge Requirements for Post-Closure Maintenance of Inactive Nonhazardous Waste Landfills within the San Diego Region," as amended. Soil from off-site locations has been imported to the landfill under Local Enforcement Agency (LEA; City of San Diego) oversight since 2001. Localized re-grading of the landfill has resulted in placement of additional imported fill soil over the original cover soil.

Site Testing and Evaluation

The *Closure Plan Naval Training Center Landfill, San Diego, California*, prepared by Ninyo & Moore (2007) summarizes the sampling and analysis that was conducted to characterize the landfill wastes and associated levels of contamination at the former NTC landfill site. The results of that sampling and analysis are summarized below, with the full *Closure Plan Naval Training Center Landfill, San Diego, California* incorporated by reference into this EIR. Currently, semi-annual groundwater monitoring and quarterly landfill gas monitoring are conducted at the site to monitor impacts to groundwater and the presence of landfill gas along the site perimeter.

Municipal Solid Waste

Municipal solid waste, consisting of everyday trash and debris, is primarily confined to the southern and central portions of the project site at depths ranging from 3.5 feet to 17.5 feet below ground surface (bgs). However, it is expected that some MSW occurs at depths exceeding 18 feet bgs. Thickness of refuse is anticipated to average approximately 8 feet, generally consisting of lumber, plastic (black plastic bags), cardboard, newspapers, fabric, food containers, and milk cartons. Additional landscape debris, consisting primarily of branches, roots, wood chips, small logs, grass clippings, and pine cones has also been observed with the MSW and scattered throughout the rest of the landfill. Investigations of the site have noted a general absence of drums, hazardous waste containers, and glass and metal refuse.

Burn Ash

Burn ash (BA) in the landfill primarily consists of burned refuse and ash and was observed in the northern landfill area. The BA waste also consists of broken glass, fused glass, glass bottles, broken white porcelain, broken plates, wood, and metal debris often as a vitrified mass in a soil matrix. Burned waste associated with concrete, brick, and cobble debris has been observed in approximately a third of the trenches excavated during a 2001 subsurface assessment, and burned waste has been estimated to be 1 to 15 percent of the excavated material. In some trenches, burned waste has been observed to occur at 0.5 to 2.5 foot thick layers. These layers have been estimated to often contain between 70 to 95 percent burned waste in a soil matrix. Constituents of concern (COC) are primarily associated with burned ash at the project site. Among the COC detected at the project site are total petroleum hydrocarbons (TPH), lead, zinc, nickel, cadmium and chromium, PCB Aroclor-1254, and dioxin/furan.

Hazardous Waste

Of the approximately 175,000 cy of MSW and BA present in the former NTC landfill, less than 5,000 cy is expected to be classified as hazardous waste pursuant to the federal Resource Conservation and Recovery Act (RCRA). Most of this potentially hazardous waste is BA material, although it may also include small amounts of MSW that is in close proximity to the BA. The vast majority of the waste—approximately 97 percent or more—is not expected to be classified as hazardous waste. The exact percentages of waste material qualifying as hazardous waste will be determined during testing conducted as part of the excavation and disposal process described in Chapter 2.0 of this EIR.

Project Objectives

The objectives of the proposed project are to remediate and close the former NTC landfill in order to:

(A) reduce potential constraints to the future use of the former NTC landfill site for airport purposes;

(B) further reduce or eliminate the potential for future public or environmental health effects associated with the buried waste located in the former NTC landfill site (although no current public health risks associated with contamination at the former NTC landfill are thought to exist); and

(C) reduce or eliminate the long-term monitoring requirements associated with the inactive landfill.

A potential outcome of the proposed project is attainment of "clean closure" status of the former NTC landfill pursuant to Title 27 of the California Code of Regulations (CCR); however, only the RWQCB

can make the finding that the Authority has successfully completed clean closure. Clean closure would indicate that all waste has been removed and that the site does not require any post-remediation monitoring. Even without achieving clean closure, the Authority can achieve the three basic objectives of the project, as listed above, by removing the vast majority of waste from the former NTC landfill.

There is no current regulatory requirement to remove the waste from the project site. This could change in the future, however, if one of two events occurs. First, it is possible (although not expected) that hazardous waste contamination associated with the former NTC landfill could ultimately affect groundwater in a manner such that impacts to groundwater extend off site. Under such a scenario, the Authority would likely be subject to a requirement to remediate the site and remove the potential source of contamination (e.g., a RWQCB Clean-up and Abatement Order). Second, it is possible that in the future, regulations regarding buried waste may become stricter, especially in an environment where the waste is in relatively close geographical proximity to an impaired water body such as the San Diego Bay. With regard to potential future remediation requirements, it is worth noting that the ongoing development of Liberty Station is proceeding generally from west to east on the former NTC property. This means that ultimately there will be additional office and visitor-serving commercial development to the immediate west of the project site (across the Navy boat channel) than there will be in 2008, when the proposed former NTC landfill remediation would occur. Thus, while it is speculative as to when or if remediation of the former NTC landfill might become mandatory (not voluntary, as is currently the case), it is unlikely that postponing landfill remediation until such a time would result in fewer people being impacted than if the remediation occurs in 2008, as is currently planned.

OVERVIEW OF THE PROPOSED PROJECT

The proposed project is the remediation of the NTC landfill and includes the following elements:

- Remove and stockpile approximately 163,000 cubic yards (cy) of surface/overburden soil (overburden soil is located above the buried waste) to reach the depths below surface grade at which MSW and BA are encountered
- Remove approximately 112,000 cy of MSW (consisting of household trash and debris) for disposal at landfill facilities located in San Diego County, including the Miramar, Otay, and Sycamore Canyon landfills
- Remove approximately 25,000 cy of BA material (consisting of existing burned refuse and trash); BA material would be excavated from the site and transported to appropriate regulated landfills in California, Arizona and Nevada in accordance with regulatory requirements

- Remove approximately 38,000 cy of additional soil to a depth of one foot below the limits of the MSW and BA materials; excavated soils would be disposed of as described for MSW and BA materials described above, as appropriate
- Import a maximum of 100,000 cy of fill to backfill the excavated area
- Replace stockpiled surface/overburden soil in the excavated area to prepare the site for future airport uses
- Implement a community health and safety plan including remediation monitoring to address any potential nuisances, including the spread of dust and odor

In addition, two City of San Diego Metropolitan Wastewater Department (MWWD) sewer lines are located below the former NTC landfill site: North Metro Interceptors 1 and 2. The Authority proposes to provide structural improvement of the two sewer pipelines to increase the static and dynamic loads of the pipelines so they can support greater weight and enable a broader range of potential future uses for the project site following completion of the proposed project.

This remediation project is expected to have a duration of approximately nine months.

ANTICIPATED ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

The proposed project was evaluated for the potential to cause environmental effects, as described below and summarized in Table ES-1 at the end of this section.

Traffic/Circulation

During landfill remediation, approximately 71 trucks would access the project site each day (for a total of 142 one-way truck trips to or from the site). In addition, it is estimated that there would be 70 workers driving to/from the site each day. Vehicle traffic associated with the proposed project would occur primarily on weekdays and also on Saturdays. Trucks hauling materials would primarily use North Harbor Drive and Nimitz Boulevard to access I-5 and/or I-8. The Year 2007 plus proposed project weekday daily traffic volumes and the results of the roadway analysis for Year 2007 traffic conditions without and with the proposed project were analyzed. The analysis indicates that the proposed project would not have any significant traffic impacts on any of the study area roadway segments or intersections on weekdays or Saturdays. Although not anticipated, should remediation activities occur on Sunday, they would be expected to have a similar traffic impact as remediation activities occurring on Saturdays—that is, traffic impacts would be expected to be less than significant.

Hazards and Toxic/Hazardous Materials

The Hazards and Toxic/Hazardous Materials section of the EIR addresses two separate topics: aviation hazards and the potential to encounter hazardous materials during project implementation.

Aviation Hazards

The proposed project does not involve any new structures or elevated terrain that would penetrate the imaginary surfaces described in 14 Code of Federal Regulations (CFR) Part 77, Objects Affecting Navigable Airspace. Project construction would be conducted in compliance with Federal Aviation Administration (FAA) Advisory Circular No. 150/5370-2E, *Operational Safety on Airports During Construction*. Also, the proposed project would include measures to minimize or prevent the scavenging of MSW by gulls, ravens or other birds, thereby minimizing the potential for the project to increase bird air strike hazards at SDIA. Accordingly, the effects of the proposed project with regard to aviation hazards would be less than significant.

Hazardous Materials

The proposed project would be conducted in accordance with all federal, state, and local laws and regulations pertaining to the use, storage, transportation, and disposal of hazardous wastes. Standard operating procedures (SOPs) and best management practices (BMPs) would be implemented in order to minimize dust, soil, and stormwater migration off-site during project activities. Discharges to San Diego Bay or the storm drain system would be controlled or eliminated through implementation of the requirements included in the contractor's Storm Water Pollution Prevention Plan (SWPPP) and a National Pollution Discharge Elimination System (NPDES) permit. In addition, project controls identified in the Community Health and Safety Plan (CHSP) and Waste Management Plan (WMP) have been developed in order to promote a safe and healthy environment for the public and workers throughout the duration of the project's implementation. Project controls would consist of implementing BMPs and protocols contained in the project-specific WMP; development and adherence to a Site Health and Safety Plan; personnel training; establishment of a Site Health and Safety Officer; and environmental monitoring.

Although the proposed project would temporarily increase potential hazards to the public or environment through the routine transport and disposal of hazardous wastes, these hazards would be minimized by the implementation of project controls. In addition, less than three percent of the total waste removed from the project site is anticipated to be hazardous waste. The removal of wastes from the project site would have long-term benefits because it would reduce the potential for future contamination of the site or surrounding area or groundwater as a result of those wastes. Therefore,

the proposed project would have less than significant impacts associated with public and environmental hazards.

As noted above, the former landfill site is known to contain some hazardous waste. The proposed project would also involve the transport of hazardous waste within one-quarter mile of existing schools. However, the proposed project would be conducted to remove and transport hazardous wastes from the project site in accordance with County of San Diego Department of Environmental Health (DEH), LEA, and California Integrated Waste Management Board (CIWMB) and RWQCB-approved protocols and federal, state, and local regulations. In addition, as discussed above, a Site Health and Safety Plan (SHSP) would be prepared prior to initiation of fieldwork that would include an emergency response plan and additional hazardous waste contingency protocols. Site workers and supervisors would be trained for working with hazardous wastes, and a Site Health and Safety Officer (SHSO) would be responsible for safety oversight and real-time monitoring of the work environment for potential hazardous conditions. Therefore, the proposed project would have less than significant impacts associated with releases into the environment resulting from foreseeable upsets or accidents.

Air Quality

- Project-related Vehicles and Equipment: Emissions from vehicles and construction equipment include the combined effects of construction equipment, haul trucks and worker vehicles operating on-site and on the surrounding roadway network. Unmitigated, project-related emissions of carbon monoxide (CO), sulfur oxide (SO_x) and volatile organic compound (VOCs) are not expected to be significant under the CEQA thresholds for criteria pollutants. In contrast, unmitigated emissions of nitrogen oxide (NO_x), particulate matter smaller than 10 microns in diameter (PM_{10}) and particulate matter smaller than 2.5 microns in diameter ($PM_{2.5}$) exceed the numerical significance thresholds. The maximum chronic (long-term) and acute (short-term) predicted cancer risks associated with the project are well below agency-established significance thresholds. Exposure levels are low largely because the potential exposure duration (i.e., 9 months or 247 days) is very small when compared to an individual lifetime (i.e., 70 years). Notably, the greatest risks (more than 90 percent) are attributable to diesel particulate matter (PM) from construction equipment and haul trucks operation on the landfill site and the adjoining roadway network. The greatest risks are attributable to exposures of fugitive dust that is reported to contain trace levels of heavy metals (i.e., chromium, lead, arsenic, etc.) and crystalline silica. According to these findings, the project's risks to human health from exposure to hazardous air pollutants (HAPs) are less than significant under CEQA. The project is expected to result in NO_x emissions in excess of the quantitative significance thresholds on a daily and hourly basis. Accordingly, this impact is assessed as significant and unmitigated.

- Landfill Emissions: Potential air pollutants associated with the project are related to decomposing landfill wastes and largely consist of H_2S, CH_4, and VOCs. Because of the varying composition and age of the excavated waste materials these emissions are difficult to predict and quantify; however, landfill gas monitoring results for the eight most recent sampling events (conducted between September 2004 and November 2006) indicate that landfill gases do not appear to be migrating off-site. The remediation project includes several measures to help ensure that these and other emissions are effectively managed and their potential impacts minimized. Among these is the Air Quality Monitoring Plan that will continually measure air quality along the project's perimeter.

- Odors: Constituents that contribute to odor would be included in the Air Quality Monitoring Plan identified above. Moreover, the San Diego Air Pollution Control District (APCD) Rule 51 (Nuisances) prohibits the creation of air quality nuisances (including odor-causing compounds). Should nuisance odors be generated by the project, the Authority (and its contractor) would be required to implement increasingly stringent measures to reduce odors. These odor control measures are described in EIR Sections 2.2.3 and 4.3. Based on the monitoring and associated nuisance-abatement requirements that are elemental components of the proposed project, the remediation of the former NTC landfill is expected to be less than significant under the CEQA criteria for odors.

- CO Hot-spot Modeling: The results of the CO hot-spot modeling in the vicinity of the three intersections associated with the proposed project indicate CO is not expected to exceed the California Ambient Air Quality Standards (CAAQS) under existing conditions. With the project, these CO levels are predicted to increase only slightly or remain unchanged. Therefore, the CO hot-spots are considered less than significant under CEQA.

- Greenhouse Gasses: Carbon dioxide (CO_2) represents the vast majority (more than 95 percent) of the green house gasses (GHGs) that would be generated during project implementation, with N_2O and methane (CH_4) representing substantially smaller (less than 5 percent) amounts.

Mitigation for the proposed project's potential air quality impacts includes measures that address the generation of particulate matter, emission of NO_x (and greenhouse gasses), and odors.

In addition to project compliance with APCD Air Quality Regulations 50 (Visible Emissions) and 54 (Dust), mitigation measures addressing $PM_{10/2.5}$ include applying soil stabilizers and other dust-prevention substances on a regular basis; following an on-site 15 mph speed limit for construction equipment and trucks; covering or stabilizing disturbed surfaces; limiting the size of the work footprint; using wheel/truck washers and securely covered truck bodies; installing windbreaks;

implementing erosion control; curtailing and/or modify excavation/backfilling activities on extremely windy days; and posting a publicly visible sign with the contact information for reporting dust complaints.

Measures addressing NO_x and greenhouse gas emissions include limiting construction equipment and haul truck idling; requiring construction equipment and haul trucks to be maintained in good tune and working order; requiring the use of new or retrofitted construction equipment and haul trucks; substituting low- and zero-emitting construction equipment as feasible; using electrical drops in place of temporary electrical generators; and implementing a construction-employee shuttle service, rideshare program and/or on-site food service to reduce workers' vehicle trips.

In addition to adherence to APCD Air Quality Regulation 51 (Nuisances), odor control mitigation measures include permanently covering disturbed surfaces with vegetation or impervious materials as soon as practicable; limiting the size of the work footprint; removing excavated landfill materials as soon as possible; applying stabilizers and other odor-prevention substances; and posting a publicly visible sign with the contact information for reporting odor complaints. Additionally, if remediation-related odors are determined to pose a "nuisance," the Authority also may curtail and/or modify excavation activities until odors are no longer a nuisance. These mitigation measures are complementary to other provisions of the Closure Plan that are designed to help minimize the potential environmental impacts, including those associated with air quality and odors.

With the implementation of these measures (described in more detail in EIR Section 4.3.5), all project-related air quality impacts would be reduced to less than significant levels except for NO_x emissions. Even with the implementation of all practicable mitigation, NO_x emissions would exceed established hourly and daily significance thresholds.

Water Quality/Hydrology

Temporary stockpiling of non-hazardous contaminated materials under the proposed project is considered a temporary discharge by the RWQCB. Best Management Practices and protocols in the WMP include adherence to RWQCB regulations for stockpiling non-hazardous soils under Resolution No. 95-96, which require the establishment of berms to prevent stormwater runoff and the placement of stockpiles at least five feet from the highest anticipated groundwater level to protect groundwater.

Additional sources of potential surface and groundwater contamination associated with the proposed project would consist of groundwater removed during excavation (dewatering), water from equipment and personnel decontamination, and storm water run-off. Water from all of these sources would be collected, stored, treated, and discharged to a designated sewer discharge point under a City of San Diego Industrial Wastewater Control Program (WCP) Industrial Users Wastewater Discharge Permit

in accordance with MWWD requirements. A wastewater storage and treatment area would be established at the project site for personnel and vehicle washdown as indicated in the Closure Plan and described in the WMP. The area around the tanks would be bermed and lined and any rainwater entering the bermed areas would be pumped into the collection tanks. Dewatering would be performed so that excavated materials are below residual saturation and do not contain free liquids. Prior to discharge into the MWWD sewer system, groundwater would be tested in compliance with Industrial WCP requirements. Pre-treatment would be provided as necessary to ensure compliance with Industrial WCP requirements. Groundwater below the project site is tidally influenced, and considered of poor quality for municipal use. No beneficial groundwater uses are designated in the RWQCB Basin Plan. Any extracted groundwater would be relatively quickly replaced by natural processes (e.g., inflow from the San Diego Bay-influenced water table), and no adverse effect to groundwater resources would result from the extraction and in-sewer disposal of groundwater during construction.

Because extracted groundwater would be disposed of via the sewer system in compliance with all applicable discharge requirements, the groundwater would not contribute effects off-site. Specifically, extracted groundwater would not cause or allow the off-site migration of contaminants associated with the buried or extracted MSW or BA.

Tsunamis and seiches of heights over several feet are rare in the San Diego Bay and are unlikely to pose a significant threat of impacting the project site during project implementation. Likewise, although the project location is identified as a Zone D area on Federal Emergency Management Agency (FEMA) floodmaps, meaning that the area hasn't been analyzed for flooding, significant impacts from flooding are not expected to occur at the project location during implementation of the proposed project, and, because the proposed project does not involve building new structures, the proposed project would not increase flooding dangers to people or structures.

Visual Resources/Aesthetics

The proposed project would not result in significant impacts to visual resources. Because the proposed project would be done in phases, all areas of the landfill deposits would not be uncovered at the same time. The stockpiled overburden material from each phase would be covered as appropriate, and only left in place (i.e., in mounds above ground) temporarily. Accordingly, the main visual resources effect of the proposed project would be to create holes and piles of soil (potentially covered with tarps) that would be visible from locations with views to the project site. No scenic resource, community identification symbol, or landmark has been identified within the project site. Therefore, no significant impacts to on-site scenic resources would occur as a result of proposed project implementation. Although travelers along McCain Road can see portions of the project site, this two-lane cul-de-sac does not carry heavy traffic loads. These views are not considered sensitive, thus

impacts to visual resources would not be significant. No impacts to scenic resources within a state scenic highway would occur. Likewise, there are no scenic vistas that would be affected by the proposed project, either from nearby open space areas or nearby roadways. There are only limited private views of the project site due to distance and/or intervening structures and topography. Those private views of the project site are not considered sensitive. Additionally, any visual effects resulting from the proposed project, such as stockpiled mounds of overburden or the presence of construction vehicles/equipment, would be temporary in nature. Any related aesthetics/visual resources impacts, therefore, would not be considered significant.

Project-related lighting and glare impacts would be less than significant as described below. Nighttime light from SDIA is emitted at levels higher than average for ambient outdoor lighting. Any construction nighttime lighting that may occur as a result of the proposed project would not excessively contribute to existing light levels in the project area; would be temporary, lasting for approximately nine months; and would be required to adhere to San Diego Municipal Code (SDMC) regulations regarding light and glare. The project would not result in any structures or buildings that could produce glare. As a matter of project design, the remediation contractor would ensure that temporary construction-related lighting shall be arranged so that it is shielded and directed downward, thus not shining on or producing glare for air traffic control personnel, aircraft pilots, adjacent street traffic, or sensitive biological resources. With implementation of this project design measure, lighting and glare impacts would be minimized and considered less than significant.

Noise

During project implementation, workers conducting the landfill remediation would be exposed to noise levels associated with airport operations, which exceed those of regular construction activities. Based on the *San Diego County Airport Land Use Compatibility Plan Policy Document*, the proposed project site is located within the 65, 70, and 75 community noise equivalent level (CNEL) noise contours for the airport. However, workers would be wearing hearing protection to counteract the effects of construction equipment noise, and impacts associated with the temporary exposure of workers to airport noise are considered less than significant.

Temporary increases in noise levels in the project area would occur during implementation of the proposed project. These temporary increases in noise levels would result from vehicular traffic noise and from construction equipment operations during the landfill remediation activities. Truck trips would occur between 7:00 a.m. and 3:00 p.m. Monday through Saturday. Project-related increases in traffic noise levels in the vicinity of roadways would be less than 0.5 A-weighted sound pressure levels (decibels [dBA]). Given that the minimum change in the sound level that an average human ear can detect is about three decibels (dB), this increase in traffic noise is less than significant. Each piece of equipment that would be used during the landfill remediation activities was considered in the noise

analysis model. The calculated 12-hour average sound levels from construction equipment during those phases of the project closest occurring to residences range between 60 and 61 dBA equivalent sound level (L_{eq}) at the nearest residential property line. Section 59.5.0404 of the SDMC limits construction noise to an average of 75 dBA for a 12-hour period at all residential property lines. The calculated 12-hour averages are below the SDMC requirement. Additionally, adherence to the City's construction hour standards also contained in the SDMC Section 59.5.0404 would ensure that impacts associated with construction equipment noise levels would remain less than significant for the nearest residential receptors. Due to the reduction of vibration levels of 6 vibration velocity in decibels (VdB) for every doubling of distance from 50 feet, and the project's distance from residential uses, the proposed project would not result in any groundborne vibration impacts.

Public Utilities

Due to the project site's proximity to San Diego Bay, the site's elevation, and the shallow groundwater, it is anticipated that dewatering would be required during the course of the project, to allow the excavation of soil and landfill materials below the water table. While the amount of groundwater to be extracted is unknown, for the purpose of analysis, the amount of water that would be extracted is estimated to be approximately 8,500 gallons per day of water. The 8,500 gallons of water per day to be discharged for treatment at the Point Loma Wastewater Treatment Plant (PLWTP) would use approximately 1/100 of a percent of the existing excess capacity at the treatment plant. If the entire estimated amount of groundwater to be extracted were discharged in a single day rather than nine months, approximately 2.5 percent of the daily excess capacity at the PLWTP would be used.

There are several sewer pipelines in the project area that connect to nearby MWWD Pump Station 2. Although flows in these pipelines may vary day-to-day, it is expected that adequate capacity exists in these pipelines to accommodate the extracted groundwater flows. In the event that excess capacity in local sewer pipelines is not available, extracted groundwater would be detained on-site until available capacity exists. Additionally, the project would be required to receive approval and a permit from the MWWD to conduct dewatering activities. As the project would be required to adhere to permit conditions provided by the MWWD, and extracted groundwater would be detained on-site temporarily, it is anticipated that capacity impacts to the pipelines traversing the project site would be less than significant.

While the project itself would not result in impacts to the North Metro Interceptors Numbers 1 and 2, the improvements to the lines would serve to prevent impacts to the buried lines from future uses.

Removed MSW would be transported to a combination of the following landfills: Miramar, Otay, and Sycamore Canyon. If these landfills reach their permitted daily capacity for MSW, the MSW may be

disposed of at the Copper Mountain Landfill in Arizona. If BA recovered at the project site were to have toxicity levels that would require it to be classified as Resource Conservation and Recovery Act (RCRA) hazardous waste, then it would be disposed of at the Clean Harbors facility in Buttonwillow, California, or at the U.S. Ecology facility in Beatty, Nevada. Some non-RCRA BA waste may also be disposed at the Copper Mountain Landfill in Arizona. Soils removed from the site would also be disposed of at one or several of these facilities, as appropriate. As several landfills are available for disposal of excavated materials, it is not anticipated that the proposed project would result significant impacts associated with inadequate capacity at landfills. As such, impacts are less than significant.

Biological Resources

The proposed project would not directly affect sensitive vegetation communities or habitat. To the extent that the project site supports vegetation, it is generally non-native and/or disturbed habitat. The project site does not support threatened or endangered species. Approximately 0.1-acre of "disturbed wetland" is located on the site but it is not jurisdictional per California Department of Fish and Game (CDFG), U.S. Army Corps of Engineers (Corps) or Coastal Commission (CC) guidelines/regulations. Accordingly, the direct effects of the project on biological resources would be less than significant.

The potential for the proposed project to indirectly affect biological resources is limited because, with the exception of the nearby boat channel, the site is generally not adjacent to sensitive habitat. The boat channel, which is directly connected to San Diego Bay, provides aquatic habitat including foraging habitat for certain bird species. Given the lighting and noise levels associated with existing Airport operations, the temporary activity at the former landfill site is not expected to reduce the potential foraging habitat value of the nearby boat channel. Intervening structures would prevent the project site lighting and noise from adversely affecting foraging within San Diego Bay. Because waste materials would be contained on site prior to being hauled away in covered trucks, no potential adverse effects from the migration of waste materials off-site is expected.

The project site is separated from the Airport's active least tern nesting locations by approximately 1.5 miles and several Airport buildings, including Terminals 1 and 2, the Commuter Terminal building; and portions of the former Teledyne Ryan leasehold. The proposed project would be in compliance with the U.S. Fish and Wildlife Service (USFWS) biological opinion (USFWS 1993) for least terns, including construction-related measures. In particular, project site lighting would not affect the nesting areas, project noise would not be perceptible at that distance, and no construction equipment would need to enter or exit the project site within 1,200 feet of the active least tern nesting area located at the southeast end of the Airport. Project-related truck traffic on Harbor Drive would not be distinguishable from the existing ambient noise levels on this heavily traveled roadway. Accordingly, project traffic on Harbor Drive would not be expected to adversely effect nesting within the airfield

locations or in San Diego Bay. For the above-noted reasons, the potential indirect biological resource effects of the proposed project are considered less than significant.

Cumulative Impacts

The potential for the proposed project to contribute to cumulative impacts is generally limited to the period of time when proposed landfill remediation activities would occur (such as excavation, stockpiling, backfilling, and the transport of wastes from the site and fill to the site). These activities are anticipated to be completed in 2008. Once remediation of the former NTC landfill has been achieved, the project would not generate traffic or other potential adverse effects on the environment. Accordingly, the cumulative impact analysis focused on other projects that would occur in the same general vicinity as SDIA and that would also occur by the end of 2008. Several concurrent or potentially concurrent development/redevelopment projects were identified, including projects within the Liberty Station area of the former NTC (west of the boat channel), on Port District Tidelands, and elsewhere in the City of San Diego. In consideration of these projects and their probable environmental effects, as well as in consideration of other past and present actions that have affected the project area environment, it was determined that the proposed landfill remediation project would not incrementally contribute to a significant cumulative impact.

Growth Inducement

The project site area was designated for Airport uses when NTC was closed and transferred to the Port of San Diego. The proposed landfill remediation would not induce growth or lead to secondary environmental effects associated with induced growth. The proposed project entails the remediation of a landfill within the boundaries of an existing Airport. Although remediation of the landfill would reduce landfill-related constraints on the future development of the site, it also is possible to accommodate those constraints without remediating the landfill. That is, there currently are engineering, design and construction measures that could allow for development of the site with Airport uses—such as aircraft parking apron, taxiways, terminal structures, and/or parking lots—even if the landfill is not remediated. The potential effects of developing the project site with Airport uses are being evaluated as part of an overall master plan process that is currently ongoing for SDIA.

Other reasons that the landfill remediation would not induce growth are that it would not add new housing or other new facilities that would entice people to move to the San Diego region; jobs created by the landfill remediation project would be temporary and could be filled by the region's existing labor pool; and the project site is located in a highly developed urban environment and the project would not extend new roads or utilities to an area where the absence of roads/utilities poses a constraint to growth.

Effects Found Not Significant

Impacts to agricultural resources, cultural resources, geology and soils, land use and planning, mineral resources, paleontological (fossil) resources, population and housing, and recreation were found not be significant and did not require detailed evaluation in this EIR.

Summary of Impacts

Table ES-1 provides a summary of the proposed project's environmental impacts, including the significance of impacts after mitigation.

Table ES-1
Summary of Environmental Impacts Resulting from Implementation of the Proposed Project

Environmental Resource	Impacts Resulting from the Proposed Project (Prior to Mitigation)	Significant Impact After Mitigation?
Traffic/Circulation	**Less-than-significant Impact.** The project's temporary (approximately nine-month) increase in traffic volumes on local roadways would not significantly degrade Levels of Service (LOS) on road segments or intersections, as evaluated per the City of San Diego's adopted significance thresholds.	No (No mitigation required)
Hazards and Toxic/Hazardous Materials	**Less-than-significant Impact.** The project includes numerous design measures that would minimize or avoid potential environmental health or public safety hazards during the former landfill's remediation. These measures address the use of equipment in the vicinity of a runway and taxiway, as well as the handling, temporary storage, and transport of hazardous wastes.	No (No mitigation required)
Air Quality	**Significant Impact.** Temporary emissions would occur from vehicles, equipment, and landfill constituents. Design measures would be implemented to minimize temporary odors emanating from the project site. A project-specific Community Health and Safety Plan indicated community health risks from the project would be negligible. Modeling of projected emissions indicated that hourly and daily NO_x emissions would exceed adopted significance thresholds.	Yes

Table ES-1 (cont.) Summary of Environmental Impacts Resulting from Implementation of the Proposed Project		
Environmental Resource	**Impacts Resulting from the Proposed Project (Prior to Mitigation)**	**Significant Impact After Mitigation?**
Water Quality/Hydrology	**Less-than-significant Impact.** Project design and construction measures would be used to avoid or minimize the potential for water (including stormwater runoff or extracted groundwater) to migrate off-site. As a result of these measures, the water quality impacts that could result from stockpiling soils, localized dewatering at the project site, personnel and vehicle decontamination, storm water run-off, and conducting remediation activities would be less than significant. A potential positive long-term effect to on-site groundwater could result from waste removal.	No (No mitigation required)
Visual Resources/Aesthetics	**Less-than-significant Impact.** The project site does not contain scenic resources and is not visible from sensitive viewing areas such as parks or scenic highways. In addition, project-related impacts to the visual setting, including visible piles of soil and nighttime lighting, would be temporary.	No (No mitigation required)
Noise	**Less-than-significant Impact.** The temporary noise impacts that would result from construction equipment and noise haul trucks would not noticeably increase noise levels at the residences nearest to the project site or along the truck haul routes leading between the site and I-8 and I-5.	No (No mitigation required)
Public Utilities	**Less-than-significant Impact.** The project would not require the extension of new utilities to the site. The planned disposal of extracted groundwater into the sewer system would be within the capacity of the sewer system and the Point Loma Wastewater Treatment Plan. Existing North Metro Interceptor Sewer pipelines that traverse under the landfill site would be provided additional structural protection.	No (No mitigation required)
Biological Resources	**Less-than-significant Impact.** The project would impact only non-native and/or disturbed habitat, and it would not adversely affect off-site habitat such as the Navy boat channel, San Diego Bay and/or the least tern nesting ovals located approximately 1.5 miles from the landfill site.	No (No mitigation required)

ALTERNATIVES

An EIR must address a range of reasonable alternatives to a proposed project, or to the location of a proposed project, which would reasonably attain most of the project's basic objectives but would avoid or substantially lessen any of its significant effects. An EIR also must evaluate the comparative merits of the alternatives.

Alternatives to the proposed project addressed in this EIR include (1) capping the site with fill, creating a structural bridge over the site to provide support for future development on the site with Airport uses and leaving the MSW and BA in place ("Cap, Bridge and Leave in Place"), and (2) No Project.

Cap, Bridge and Leave in Place

This alternative would require substantially less earthwork than the proposed project and would also generate substantially fewer truck trips. The reduction in earthwork reflects that the site would be graded level and, depending on the design of the ultimate landfill cap and structural supports, some new fill might be imported to the site. No waste would be hauled from the site, and there would be no need to import material to backfill holes created by the excavation and off-site disposal of waste.

Under this alternative, there would be substantially less construction activity and truck traffic. Landfill materials would be left in place. Accordingly, it would be expected that this alternative would not generate NO_x emissions in excess of daily or hourly limits, thereby avoiding the only significant and unmitigated impact of the proposed project. Emissions of other pollutants would also be reduced, and no air quality mitigation would likely be necessary to avoid significant air quality impacts. Because this alternative would not uncover or expose the buried MSW and BA, it would not have the proposed project's potential to generate noxious odors. The potential odor impacts of the proposed project are considered less than significant, in part due to design measures intended to help minimize odors. In addition, because the landfill site would not be remediated, the landfill would continue to be monitored for emissions.

As with the proposed project, other impacts associated with site reuse would be less than significant.

As noted previously, it would be possible to develop the former NTC landfill site with Airport uses even if the former landfill is not remediated. Depending on the specific Airport use proposed for the site, the engineering, design and construction measures used to accommodate landfill-related development constraints could include the use of piers sunk into the ground to provide structural support for a building, taxiway or aircraft parking apron (these piers and the structure they support would form the "bridge" referenced in this alternative's title). If a habitable structure (such as a

passenger terminal) is proposed to be built over the former landfill site, it would require adequate ventilation to ensure that any future landfill off-gassing would not adversely affect public health and safety.

No Project Alternative

Pursuant to CEQA and the State CEQA Guidelines, this EIR also evaluates a No Project Alternative. The No Project Alternative would avoid the significant air quality impacts of the proposed project but would not achieve any of the proposed project's objectives. That is, it would not reduce or eliminate landfill-related constraints the future development of the site, it would not reduce or eliminate the potential for future public or environmental health effects associated with the buried waste, and it would not reduce or eliminate the long-term monitoring requirements associated with the former NTC landfill. As described above for the Cap, Bridge, and Leave in Place Alternative, it would be possible to develop the project site with Airport uses even if the landfill is not remediated.

Alternatives Considered but Not Carried Forward for Detailed Evaluation

The following alternatives were initially considered but were not carried forward for detailed evaluation because they would not avoid or minimize the significant effects of the proposed project, would not meet the proposed project's most basic objectives and/or would not be feasible:

- Alternative dewatering methods: Disposal into San Diego Bay and disposal via groundwater recharge), and
- Removal of all waste associated with the former NTC landfill: Removal of waste from under utilities, the aircraft apron, Taxiway B, and within 200 feet of the Runway 9/27 centerline.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the *State CEQA Guidelines* requires that, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." In this instance, determining the Environmentally Superior Alternative largely depends on balancing short-term, but unmitigated NO_x impacts—as well as other less-than-significant impacts associated with project construction—against the long-term effects of leaving buried MSW and BA in place near the boat channel and San Diego Bay.

The proposed project's NO_x emissions would exceed established thresholds, but would be short term and would not prevent the San Diego Air Basin from reaching attainment with state and federal air quality standards. All other effects of the proposed project would be less than significant or mitigated to less-than-significant levels. Given that the proposed project would remediate a potential long-term

source of contamination, it suggests that this is an acceptable tradeoff for short-term air quality impacts. However, the potential positives of site remediation must be considered in light of the fact that the buried MSW and BA has not to date been documented or identified as a threat to environmental health or safety, and there is no current regulatory requirement to remove this waste and dispose of it at regulated landfills. Nonetheless, in consideration of the short-term nature of the project's significant NO_x emissions, the less-than-significant effects of the project on other resource areas, and the potential long-term benefits of the proposed project's removal of MSW and BA from a site close to the boat channel and San Diego Bay, the Authority considers the proposed project to be environmentally superior to each of the other alternatives considered, including the No Project Alternative.

SIGNIFICANT UNAVOIDABLE EFFECTS

As summarized above and described in this EIR, the proposed project would result in significant and unmitigated air quality impacts associated with short-term emissions of NO_X in excess of established hourly and daily thresholds. All other impacts of the proposed project would be less than significant or mitigated to less-than-significant levels.

AREAS OF CONTROVERSY

Areas of potential controversy identified during the public scoping period and/or during preparation of the Draft EIR include potential effects on public health, water quality, air quality, and biology, as well as potential impacts associated with truck traffic heading to/from the former NTC landfill site.

To the extent that there are issues of public controversy associated with the project, it appears that these primarily relate to community concerns about past efforts (or the lack thereof) to remediate the landfill, as well as concerns regarding past disclosure (or, again, the lack thereof) of the landfill and its contents, and/or other local landfills operated and closed during the same period, to members of the surrounding community. To date, the Authority is not aware of any parties that would prefer the former NTC landfill not be remediated and closed.

The Port District expressed concerns in its NOP response letter that a small portion of the landfill under an active Airport taxiway may not be remediated as part of the proposed project.