

TERMINAL 2 EAST MODERNIZATION PROJECT  
SAN DIEGO INTERNATIONAL AIRPORT

**INITIAL STUDY**

Prepared for  
San Diego County Regional Airport Authority  
PO Box 82776  
San Diego, CA 92138

May 2026



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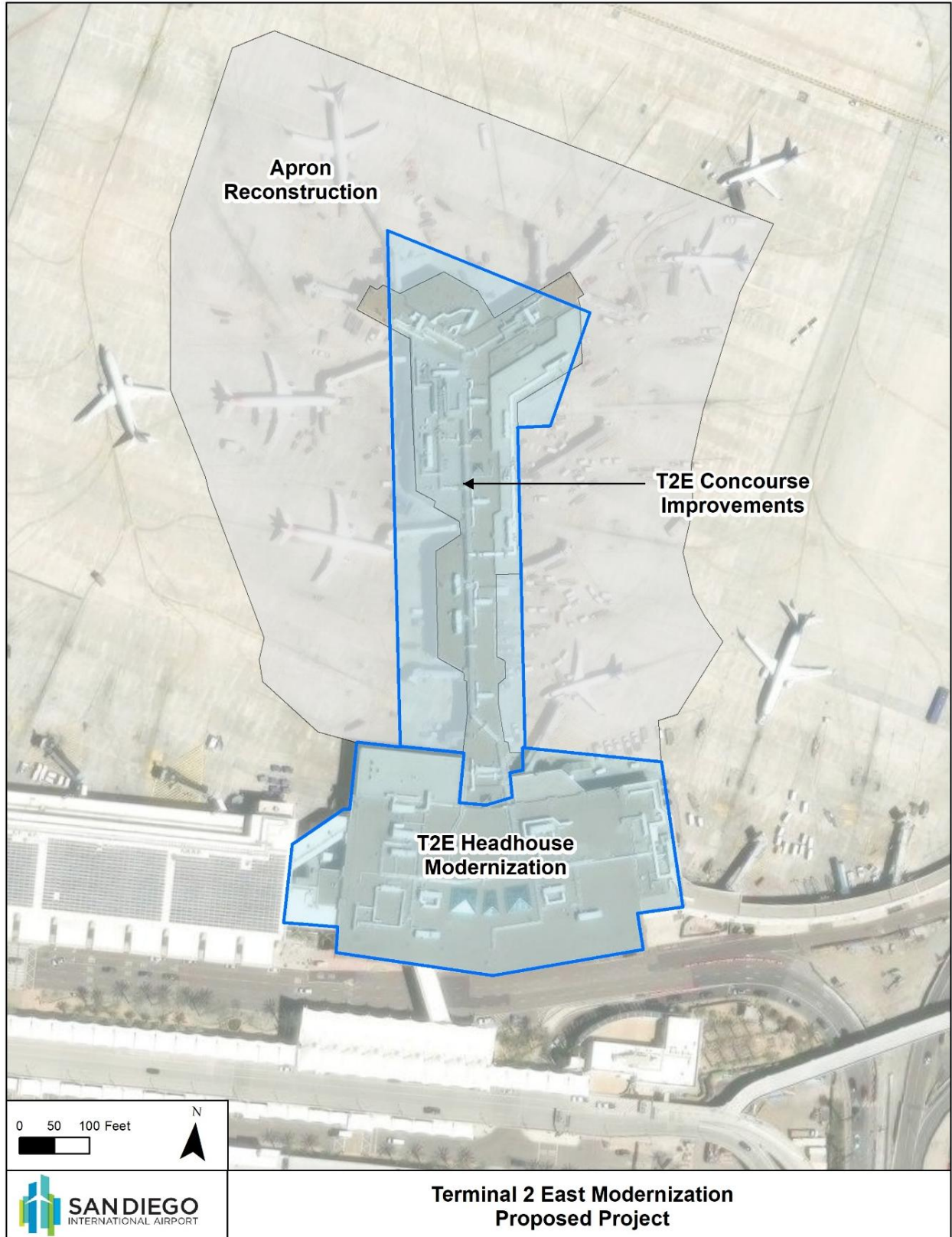
# ENVIRONMENTAL CHECKLIST

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## Initial Study

1. Project Title: Terminal 2 East Modernization Project
2. Lead Agency Name and Address: San Diego County Regional Airport Authority  
PO Box 82776  
San Diego, CA 92138
3. Contact Person and Phone Number: Ted Anasis, Planning Manager  
(619) 400-2478
4. Project Location: San Diego International Airport – Terminal 2 East  
  
3835 N Harbor Drive  
San Diego, CA 92101
5. Project Sponsor’s Name and Address: San Diego County Regional Airport Authority  
2417 McCain Road  
San Diego, CA 92101
6. General Plan Designation(s): Institutional & Public and Semi-Public Facilities
7. Zoning: San Diego International Airport
8. Description of Project:

The San Diego County Regional Airport Authority (SDCRAA/Authority) is undertaking the Terminal 2 East (T2E) Modernization Project (Project) to enhance efficiency and passenger experience, while preserving core infrastructure and maintaining operations. As further described below, the primary elements of the Project include the modernization of the headhouse, concourse, landside, airside, and utilities. The Project would not result in changes to aircraft operations, including flight frequency, flight paths, or runway usage. **Figure 1, Proposed Project**, presents the overall development concept and footprint for the Project. T2E currently provides access to 13 gates, which would not change with the implementation of the Project. The objectives of this Project are to enhance airport functionality, passenger experience, and operational efficiency by addressing critical challenges, including limited operational flexibility and support spaces, capacity constraints, long wait times, and inefficient circulation. The Project aims to improve passenger flow, provide adequate service and serving spaces, and focus on resolving outdated and inconsistent infrastructure.



**Figure 1**  
Proposed Project

## Project Overview

The T2E complex includes a headhouse that provides pre-security passenger processing, ticketing, check-in, baggage claim, and security screening functions, and a concourse that provides post-security access to aircraft gates, passenger seating, retail and concessions, restrooms, and other passenger services. Improvements to the terminal, therefore, include two key components: (1) headhouse modernization; and (2) concourse improvements. Both the headhouse and concourse are two level structures, with Level 1 referred to as the ground level, and Level 2 referred to as the concourse level. To maintain operational continuity, the demolition and replacement of the structures would be phased as needed, with temporary gate closures offset by utilizing existing capacity at Terminal 2 West and the newly expanded Terminal 1 (see Construction Phasing, below). The Project would not result in changes to aircraft operations, including flight frequency, flight paths, or runway usage. The Project would increase the existing building area of T2E from 281,974 SF by 107,976 SF for a total building area square footage of 389,950 SF.

### Headhouse

The Project includes structural preservation of the headhouse with an expanded northeast corner, new curtain walls, reconfigured entry points, and improved vertical circulation and signage. Key improvements include a full-size Security Screening Checkpoint (SSCP) with automated exit lanes, self-bag-drop systems, an oversized baggage lift, and consolidated airline ticket offices (ATO). The headhouse work primarily focuses on interior renovation and modernization; and, most existing areas would remain as-is, with the exception of new construction for the northeast corner expansion to support the expanded SSCP and holdroom on Level 2.

### Concourse

The Project's concourse improvements would demolish existing infrastructure to rebuild and expand the concourse building square footage. The portions to be demolished would include the original 1979 concourse North of Grid 7, the 1991 American Airlines addition, the 1995 Marriott concessions addition, and the 2011 Gate 25 / Gates 24-26 additions. The existing portion of the T2E end of concourse would be demolished for construction of the new north concourse. The new end of concourse would feature expanded holdrooms, optimized passenger flow, two restroom blocks, self-boarding infrastructure, and biometric facepods. The concession areas would be renovated with increased seating and enhanced retail and food and beverage options. The concourse would provide back-of-house support areas and enclosed waste management facilities with compactors. The existing concrete frame between the headhouse and the end of concourse would be demolished and replaced. The corridors, retail, and holdrooms for Gates 23 through 26 would be expanded.

### Airside

Airside improvements would include replacement of apron pavement, grading, and the full replacement of passenger loading bridges and critical infrastructure to accommodate a broader and more flexible aircraft fleet mix. Approximately 430,000 square feet of the apron pavement would be replaced. Apron reconstruction and striping would also be included to accommodate the future extension of Taxiway Alpha and integration with a planned fuel hydrant system. Gates 23, 24, and 25 would be reconfigured with new aircraft parking layouts along the new concourse.

## Landside

The landside improvements would enhance the passenger arrival and departure experience, accessibility, and operational efficiency. Improvements include upgraded streetscape design, ADA-compliant access, and targeted pedestrian safety enhancements to better manage growing curbside activity, including exterior lighting, wayfinding, regulatory signage and a buffer zone equipped with physical protection elements and hardened façade treatments along the T2E frontage.

## Utilities

The utility scope would include electrical, water, plumbing, natural gas, and fiber optic utility relocations and service modifications to support each phase of construction, ensuring uninterrupted functionality of terminal systems and minimizing impacts to ongoing operations.

## Construction Phasing

To maintain operational continuity, the demolition and replacement of the structures would be phased as needed, with temporary gate closures offset by utilizing existing capacity at Terminal 2 West and the newly expanded Terminal 1. However, for purposes of the environmental analysis, a worst-case scenario was assessed by evaluating the impacts of construction of the Project as a single phase headhouse. The construction of the headhouse and end of concourse is anticipated to take up to 24 months to complete, with the construction of the remaining improvements taking approximately 36 months to complete, for a total construction duration of approximately five years.

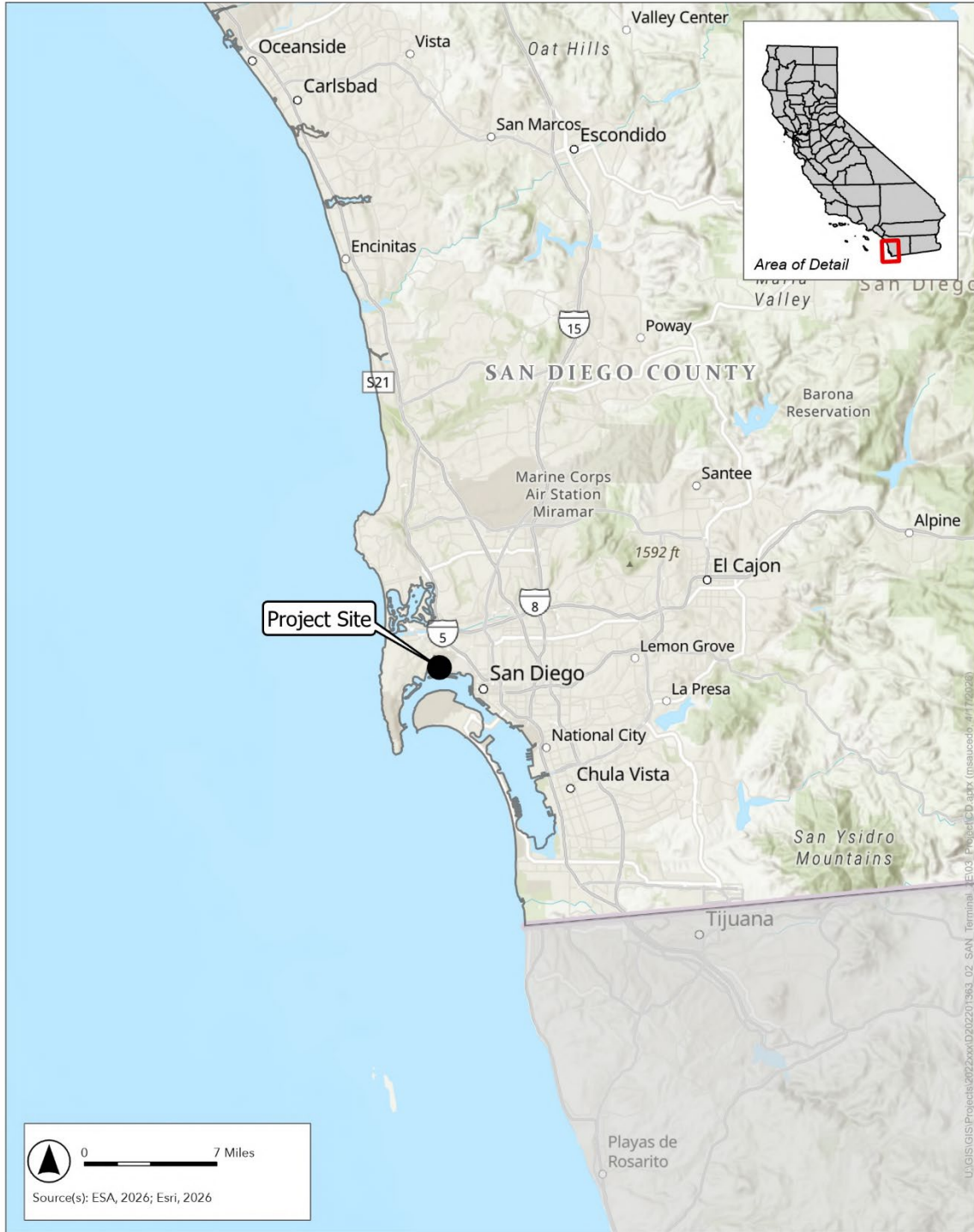
### 9. Surrounding Land Uses and Setting.

San Diego International Airport (SDIA) is in the northwest portion of the downtown area of the City of San Diego and is generally bounded by North Harbor Drive and San Diego Bay to the south, the Navy Boat Channel and Liberty Station mixed-use development to the west, the Marine Corps Recruit Depot (MCRD) to the north, and Pacific Highway and Interstate 5 to the east. **Figure 2, Regional Location Map**, shows the general location of SDIA within the regional context. The site is located in a highly urbanized area that is surrounded by existing commercial, industrial, military, residential, and recreational uses, and the San Diego Bay. The site is situated between T2W to the west and NT1 to the east. The site is bounded by the arrival roadway to the south and Taxiway B to the north.

### 10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

N/A

### 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?



**Figure 2**  
Regional Location Map

Pursuant to AB 52, the Authority will conduct consultation with Native American Tribes who have requested to be informed of activities initiated by the Authority. There is a potential for the proposed Project to affect tribal cultural resources during ground-disturbing activities associated with construction of the Project. The EIR will evaluate potential impacts to tribal cultural resources and incorporate the results of AB 52 consultations into the analysis.

## Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources                     | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" 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 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 type="checkbox"/> Transportation                      | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the 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 project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the 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 project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

*Ted Anasis*

Signature  
 Ted Anasis, Planning Manager  
 San Diego County Regional Airport Authority

May 6, 2026

Date

Signature

Date

# Environmental Checklist

## Aesthetics

<u>Issues (and Supporting Information Sources):</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>I. AESTHETICS</b> — Except as provided in Public Resources Code Section 21099, would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** Scenic vistas visible from San Diego International Airport (SDIA/Airport) include views of San Diego Bay, the Pacific Ocean, the Point Loma peninsula, and the downtown skyline along San Diego Bay. The proposed construction activities associated with the Project would be constrained to the existing footprint of the SDIA campus, and more specifically, to the existing T2E structure footprint and apron. All construction activities would be located on-Airport and would incorporate temporary construction fencing/barriers to screen construction activities and equipment. Impacts to public scenic views from the landside for pedestrians and drivers picking up and dropping off passengers would be temporary (limited to those associated with construction of the T2E new construction). Elevated areas east/northeast of the Airport have relatively unobstructed views of these scenic resources and would not be impacted by the work proposed on campus. The proposed facilities would not affect designated scenic views from south of SDIA from Spanish Landing Park and Harbor Island south towards San Diego Bay, downtown San Diego, and the Pacific Ocean. Views to the downtown skyline from portions of MCRD San Diego are not public and therefore would not be impacted by the Project. From a distance, views of the completed T2E reconstruction would remain visually indistinct from surrounding development and would not contribute to, or detract from, scenic views. Therefore, the Project would not have a substantial adverse effect on a scenic vista, and no further evaluation is warranted.
- b) **No Impact.** The Project is located within the boundaries of the SDIA property and not adjacent to or within the viewshed of a designated state scenic highway. The nearest officially designated state scenic highway is State Route 163 (SR 163), located approximately 2 miles east of the Project site (a one-mile segment of SR 163 along the western portion of Balboa Park) (Caltrans

2018). The nearest state scenic highway eligible for listing is Interstate Route 5 (I-5), located approximately 1 mile north of the Project site (Caltrans 2018). Therefore, as the Project would not damage scenic resources within a designated scenic highway, no impacts would occur and no further evaluation is warranted.

- c) **Potentially Significant Impact.** The Project proposes interior renovation and new construction within the apron and T2E structure of the existing T2E footprint, consistent with existing uses. No changes to zoning are proposed. However, due to the new construction and proposed landside improvements, consistency with regulations governing scenic quality would be assessed in the EIR. The façade and character of the Project is proposed to be aligned with the most recently completed terminal projects, including Terminal 2 West (T2W) and New Terminal 1 (NT1). Due to the Project's proposed reconstruction of the T2E headhouse and concourse and the proposed pedestrian safety enhancements on the landside, further evaluation is warranted in the EIR to determine if potentially significant impacts to applicable zoning and other regulations governing scenic quality.
- d) **Potentially Significant Impact.** Primarily existing sources of light at the SDIA include light emanating from buildings (i.e., terminals, cargo and maintenance facilities, administrative buildings, the Rental Car Center, and other airport facilities), light from exterior sources (i.e., airfield lighting, parking, security, lighting, street lightings, wayfinding, and landscaping lighting), and from private vehicles, buses, and shuttles. Due to the Project's proposed reconstruction of the T2E headhouse and concourse and the proposed pedestrian safety enhancements on the landside, including exterior lighting, further evaluation is warranted in the EIR to determine if potentially significant impacts to daytime or nighttime views in the area.

## References

- California Department of Transportation (Caltrans). 2018. Caltrans Statewide Scenic Highway. Accessed March 31, 2026. <https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774>.
- San Diego County Regional Airport Authority (SDCRAA). 2020. Recirculated Draft Environmental Impact Report for the Airport Development Plan, Chapter 3.1, Aesthetic and Visual Resources. Accessed March 31, 2026. <https://www.san.org/airport-planning/>.

# Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>II. AGRICULTURE AND FORESTRY RESOURCES —</b>				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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"/>

## Discussion

a-e) **No Impact.** The Project site is an active airport use, has a general plan designation of Institutional & Public and Semi-Public Facilities, and is zoned San Diego International Airport. There are no agricultural resources or operations at the Project site or within the surrounding areas, including prime or unique farmlands or farmlands of statewide or local importance (DOC 2022a). Further, there are no Williamson Act contracts in effect for the Project site or surrounding areas (DOC 2022b). Therefore, the Project would not convert farmland to non-agricultural uses nor would it result in any conflicts with existing zoning for an agricultural use.

There are no forest land or timberland resources or operations within the vicinity of the Project site, including timberland zoned Timberland Production (City of San Diego 2024). Therefore, the Project would not convert forest land or timberland to a non-forest use. No further evaluation of impacts to agriculture and forestry resources is warranted.

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## References

City of San Diego. 2024. 2024 General Plan Land Use Element. Adopted 2008. Amended 2024. Accessed March 27, 2026. [https://www.sandiego.gov/sites/default/files/2025-06/general-plan\\_02\\_land-use\\_june-2025.pdf](https://www.sandiego.gov/sites/default/files/2025-06/general-plan_02_land-use_june-2025.pdf).

Department of Conservation (DOC). 2022a. California Important Farmland Finder. Accessed March 27, 2026. <https://maps.conservation.ca.gov/dlrp/ciff/>.

Department of Conservation (DOC). 2022b. Williamson Act Enrollment Finder. Accessed March 27, 2026. <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>.

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## Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>III. AIR QUALITY —</b>				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
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) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a-b) **Potentially Significant Impact.** The Project site is located within the San Diego Air Basin (SDAB). The San Diego County Air Pollution Control District (SDAPCD) in combination with the San Diego Association of Governments (SANDAG) is responsible for preparing plans and air quality pollution control strategies within the region. The SDAB has been designated as a nonattainment area for the state PM<sub>10</sub>, PM<sub>2.5</sub>, and O<sub>3</sub> standards. The SDAB is also a federal O<sub>3</sub> attainment (maintenance) area for 1997 8-hour O<sub>3</sub> standard, an O<sub>3</sub> nonattainment area for the 2008 8-hour O<sub>3</sub> standard, and a CO maintenance area (western and central part of the SDAB only). The regional air quality plans addressing the air pollution in the SDAB are the SDAPCD’s 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County, the Regional Air Quality Strategy, and the Measures to Reduce Particulate Matter in San Diego County report. Air pollutant emissions associated with construction and operation of the Project have the potential to increase air emissions and criteria air pollutants that may affect the implementation of the air quality plans. The construction of the Project is expected to involve large quantities of heavy duty equipment and the potential for overlapping phasing that may conflict with pollutant thresholds established by the SDAPCD. Therefore, implementation of the Project would have the potential to result in potentially significant impacts, and further evaluation is warranted.
- c) **Potentially Significant Impact.** As noted under Surrounding Land Uses and Setting, the site is located in a highly urbanized area that is surrounded by existing commercial, industrial, military, residential, and recreational uses, and the San Diego Bay. T2E is situated between T2W to the west and NT1 to the east. The nearest air quality sensitive land uses within proximity to the Project site include Marine base medical uses and housing uses approximately 2,000 feet to the north above Guantanamo Street, and residential uses approximately 4,500 feet to the west along Cushing Road. In addition, the Grand Caribe Shoreline Park is located to the south of the Project. Other sensitive receptors include SDIA employees. Construction activities could increase localized emissions of criteria air pollutants and toxic air contaminants that may expose sensitive

receptors to substantial pollutant concentrations. Therefore, implementation of the Project would have the potential to result in potentially significant impacts, and further evaluation is warranted.

- d) **Less Than Significant Impact.** During construction of the Project, exhaust from equipment and activities associated with the application of architectural coating and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors have the potential to be a temporary source of nuisance to adjacent uses. The closest sensitive receptors include Marine base medical uses and housing uses approximately 2,000 feet to the north above Guantanamo Street. Impacts from odors would be less than significant as the odors would likely disperse to negligible levels due to the distance between the T2E work and these offsite sensitive receptors.

Additionally, operation of the Project would not result in a notable source of odors adversely affecting a substantial number of people. The Project would not increase the amount of aircraft utilizing T2E and therefore would not substantially increase the smell of aircraft engine exhaust which is discernible at and around the SDIA from time to time, depending on meteorological conditions such as wind speed and direction. Thus, implementation of the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and no further evaluation of impacts to odors is warranted.

## References

SDAPCD, 2023. 2022 Regional Air Quality Strategy (RAQS). Adopted March 9, 2023.

SDAPCD, 2020. 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. Adopted October 14, 2020; approved by CARB November 19, 2020; submitted to U.S. Environmental Protection Agency January 8, 2021.

SDAPCD, 2005. Measures to Reduce Particulate Matter in San Diego County, December 2005.

## Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IV. BIOLOGICAL RESOURCES — Would the project:</b>				
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrologic 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** A search of the California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants, and U.S. Fish and Wildlife Services’ Information for Planning and Consultation resulted in the evaluation of 97 species for their potential to be impacted by the Project (CDFW 2026; CNPS 2026). Of these species, the Project area does not contain suitable habitat for any special-status plant species and does not contain suitable nesting or breeding habitat for any special-status wildlife species. No marine species, including eelgrass, are likely to be directly or indirectly impacted (e.g., changes to water quality) by the Project due to water quality protection measures to be implemented during construction. Additional stormwater quality measures would also be in place during operations to reduce hydrologic runoff to these water bodies in a way that would impact marine species (see Section X, *Hydrology and Water Quality*, of this Initial Study, below). One species, the California least tern (*Sterna antillarum browni*), actively nests at the SDIA property within the runway ovals on the eastern portions of the SDIA property. However, this is outside of the Project area, and the Project’s activities would not result in a significant impact to this species, including its use of breeding habitat within the SDIA property or access to adjacent foraging locations. The Project is limited to the modernization of an existing aviation airport terminal and would not have a substantial adverse effect, either directly or through habitat

modifications, on any species identified as a candidate, sensitive, or special-status species. Therefore, impacts would be less than significant and no further evaluation is warranted.

- b) **No Impact.** A search of the CNDDDB and CNPS Online Inventory of Rare and Endangered Plants resulted in the finding that the SDIA property does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations (CDFW 2025a; CNPS 2026). Furthermore, no federally protected wetlands or jurisdictional waters of the United States or state have been identified within the SDIA property per the National Wetlands Inventory (NWI; USFWS 2026b) or National Hydrology Dataset (NHD; USGS 2026). Therefore, impacts would be less than significant, and no further evaluation is warranted.
- c) **No Impact.** Per a search of the NWI, NHD, and aerial imagery, no state or federally protected wetlands are present on the property (USFWS 2026b; USGS 2026; Google Earth 2026). The Project would modify the existing T2E and surrounding apron, which are areas that would lack the hydrological and vegetative characteristics to be classified as wetlands, marshes, or vernal pools. Therefore, no impacts are anticipated, and no further evaluation is warranted.
- d) **Less Than Significant Impact.** The SDIA property is within the Pacific Flyway<sup>1</sup> for migratory bird species; however, existing conditions at the SDIA property would not substantively change in a manner that would contribute, either directly or indirectly, to use of the site for migration. As the Project site is an active airport with paved, developed conditions, there are no native wildlife nursery sites located within or immediately adjacent to the SDIA property (SDCRAA 2020). Therefore, impacts would be less than significant, and no further evaluation is warranted.
- e) **No Impact.** No ornamental landscaping or trees are expected to be impacted or removed. Any ornamental landscaping or trees removed during construction or terminal expansion would be managed in accordance with the SDCRAA's design and sustainability guidelines. Although SDIA is not subject to City of San Diego regulations, for purposes of aligning with local neighboring jurisdictions, assessment of applicable local policies and ordinances from the City of San Diego were addressed. The Project does not include any improvements that would be subject to any local policies or ordinances from the City of San Diego protecting biological resources (e.g., public tree protection). Furthermore, all vegetation within the Project area includes ornamental non-native species that would not be eligible for protection under City of San Diego policies or ordinances. Therefore, no impacts are anticipated, and no further evaluation is warranted.
- f) **No Impact.** The Project site is not situated within the boundaries of an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) (CDFW 2025b). SDIA is excluded from the City of San Diego's Multiple Species Conservation Program (MSCP) and the associated Multi-Habitat Planning Area (MHPA) or Environmentally Sensitive Lands

<sup>1</sup> Pacific Flyway: Migratory birds use four major migratory routes (Pacific, Central, Mississippi, and Atlantic flyways) in North America. The Pacific Flyway includes Alaska, Arizona, California, Idaho, Nevada, Oregon, Utah, Washington, and those portions of Colorado, Montana, New Mexico, and Wyoming west of the Continental Divide. (Pacific Flyway Council, 2026).

(ESL) (SDCRAA 2020). Therefore, no impacts related to an applicable approved local, regional, or state habitat conservation plan are anticipated, and no further evaluation is warranted.

## References

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## Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>V. CULTURAL RESOURCES</b> — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (Public Resources Code Section 21084.1; 14 California Code of Regulations 15064.5(b)). If a site is listed or eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of Public Resources Code Section 5024.1(q)), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (CEQA Guidelines Section 15064.5(a)). The NRHP includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. The CRHR is an inventory of significant architectural, archeological, and historical resources in the State of California.

The Project site is located within the western portion of the SDIA property, an area that has been extensively developed for aviation use since the mid-20<sup>th</sup> century. SDIA is characterized by development, including the construction of modern structures, paved roads, parking lots, runways, and taxiways. T2E was constructed in 1979 as a Brutalist-style airport terminal with Futurist influences on the primary (south) façade of the main terminal area and International influences on the north, west, and east façades. T2E has undergone various interior renovations and functional modifications over the decades to accommodate changing security and passenger processing requirements, which has impacted the historic integrity of the remaining structure.

The SDIA Airport Development Plan Project EIR evaluated Terminal 2 East (P-37-036757) under the applicable federal, state, and local eligibility criteria, and determined that Terminal 2 East does not meet the level of significance required for individual listing on the National Register and the California Register under any criterion. Therefore, T2E is not considered a historical resource pursuant to CEQA, and implementation of the Project would not cause direct impacts or adverse changes to a historical resource, and further evaluation of impacts to historical resources in the EIR is not warranted.

The Project site is located within the SDIA property, an area that has been subject to extensive development. However, the SDIA property is situated in a region of high archaeological sensitivity due to its proximity to the historic shoreline of the San Diego Bay, which was a focus of prehistoric and ethnographic human activity. The Project would require significant subsurface construction to support the replacement of the concourse, including deep excavation for new structural foundations, the installation of a new subterranean fuel hydrant system, and the relocation of critical lines that may extend below the known limits of dredged fill within the Project site. While much of the Project site consists of previously disturbed soils and varying depths of artificial fill, there is a potential for native, undisturbed soils to exist beneath these layers. The excavation depths required for the Project could penetrate through the fill and into older, potentially resource-bearing, landforms. Given the scale of ground disturbance and potential excavation depths, the Project could encounter and cause a substantial adverse change in the significance of an unique archaeological resource that is considered a historical resource pursuant to CEQA Guidelines Section 15064.5. Therefore, impacts to archaeological resources resulting from implementation of the Project may be potentially significant, and further evaluation is warranted in the EIR.

- b) **Potentially Significant Impact.** As described above, the Project site is located within the SDIA property, an area that has been subject to extensive development. However, the SDIA property is situated in a region of high archaeological sensitivity due to its proximity to the historic shoreline of the San Diego Bay, which was a focus of prehistoric and ethnographic human activity. The Project would require significant subsurface construction to support the replacement of the concourse, including deep excavation for new structural foundations, the installation of a new subterranean fuel hydrant system, and the relocation of critical lines. While much of the Project site consists of previously disturbed soils and varying depths of artificial fill, there is a potential for native, undisturbed soils to exist beneath these layers. The excavation depths required for the Project could penetrate through the fill and into older, potentially resource-bearing, landforms. Given the scale of ground disturbance and potential excavation depths, the Project could encounter and cause a substantial adverse change in the significance of unique archaeological resources pursuant to CEQA Guidelines Section 15064.5. Therefore, impacts from the Project may be potentially significant, and further evaluation is warranted in the EIR.
- c) **Less than Significant Impact.** Although there are no known dedicated cemeteries within the SDIA property, the area is situated in a region of high archaeological sensitivity which could include human remains. In the unlikely event proposed excavations could impact previously unknown buried human remains, SDCRAA would comply with the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code,<sup>12</sup> and Sections 5097.94(k) and

(i) and Sections 5097.98(a) and (b) of the Public Resources Code.<sup>2</sup> Therefore, impacts would be less than significant, and further evaluation of this issue is not warranted.

## References

SDCRAA. 2020. Recirculated Draft Environmental Impact Report for the Airport Development Plan, Chapter 3.6, Cultural Resources. Accessed April 3, 2026. <https://www.san.org/airport-planning/>.

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<sup>2</sup> California Health and Safety Code Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours. Section 5097.98 of the California Public Resources Code stipulates that whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24 hours of their notification by the NAHC. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

# Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VI. ENERGY</b> — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Construction and operation of the Project would require energy resources, such as electricity, natural gas, and various transportation-related fuels. Construction of the Project would include energy demand from worker, vendor, and haul vehicle trips, as well as construction equipment usage. Although the energy consumption is not anticipated to be wasteful, inefficient, or unnecessary and would comply with existing energy conservation plans, this topic warrants further evaluation.

During Project operations, electricity and natural gas consumption would result from a number of activities, including space heating and cooling, airfield and terminal lightings, and food preparation. Other energy consumption during project operations would include aviation fuel for aircraft, as well as diesel, gasoline, and alternative fuels for ground support equipment and airport-related motor vehicles trips. However, as the Project would not change the number of gates from existing conditions, aviation fuel would not be considered in the assessment of the unnecessary use of operational fuel. All new construction would be required to comply with current state energy efficiency standards and regulations pursuant to CALGreen that would reduce long-term electricity and natural gas demand. In addition, SDCRAA has developed the Strategic Energy Plan (STEP) that addresses energy efficiency and conservation; on-site energy generation and storage; and enhanced monitoring of key energy metrics to ultimately allow SDIA to establish more dependable energy sources (SDCRAA 2019). These requirements would avoid the wasteful, inefficient, and unnecessary consumption of energy. The energy consumption required for the continuation of operational activities with the modernization of T2E is not expected to result in a significant impact; however, this topic will require further evaluation.

- b) **Potentially Significant Impact.** All new construction would be required to comply with current state energy efficiency standards and regulations pursuant to CALGreen that would reduce long-term electricity and natural gas demand. The Project would be consistent with and implement applicable energy conservation measures such as those identified in the City of San Diego’s General Plan and the City’s 2022 Climate Action Plan. In addition, SDCRAA has developed the STEP that addresses energy efficiency and conservation; on-site energy generation and storage; and enhanced monitoring of key energy metrics to ultimately allow SDIA to establish more dependable energy sources (SDCRAA 2019). However, further evaluation is required to determine if the Project would achieve consistency with state or local plans for renewable energy or energy efficiency.

## References

SDCRAA. 2019. Strategic Energy Plan (STEP). Accessed April 12, 2026 [https://www.san.org/wp-content/uploads/2025/08/SAN\\_STEP\\_081919.pdf](https://www.san.org/wp-content/uploads/2025/08/SAN_STEP_081919.pdf)

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## Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VII. GEOLOGY AND SOILS —</b> Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<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 waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a.i) **Less Than Significant Impact.** The SDIA property is located along a northward continuation of an active segment of the Spanish Bight Fault and within the Point Loma Alquist-Priolo Earthquake Fault Zone (SDCRAA 2020a, DOC 2026). A previous Fault Hazard Study of the SDIA property recommends a “No Build Zone” that includes the zone of active faulting and a setback buffer zone of 25 feet along both sides of the fault (SDCRAA 2020a). The Project site is located outside of this fault hazard zone by approximately 3,000 feet. In addition, the Project would be required to comply with the California Building Code (CBC) and local building regulations that would require the preparation of a geotechnical investigation to describe site-specific geotechnical conditions and provide geotechnical recommendations to address geotechnical issues, as needed. Preparation of the geotechnical investigation is a condition of permit approval for proposed projects. Therefore, the potential for substantial direct or indirect adverse effects resulting from rupture of a known earthquake fault or strong seismic ground shaking would be considered low and impacts would be less than significant; therefore, no further evaluation is warranted.

- a.ii) **Less Than Significant Impact.** The Project site, as with most of Southern California, is located within a seismically active region. The Project would modernize and reconstruct T2E in compliance with the latest earthquake-resistant building design standards which would reduce potential structural damage and the risk of public safety from seismic events. As noted in Item VII.a.i above, the Project site would not be located within the No Build Zone established by previous geotechnical studies of the SDIA site (SDCRAA 2020a, DOC 2026), which would further reduce risks associated with seismic ground shaking. Compliance with local building regulations would require the preparation of a geotechnical investigation to describe site-specific geotechnical conditions and provide geotechnical recommendations to address geotechnical issues, as needed. The geotechnical investigation shall provide recommendations for the design of foundations and subgrade construction, seismic design criteria, and recommendations for the design of systems affected by geotechnical conditions such as ground shaking. Preparation of the geotechnical investigation is a condition of permit approval for proposed projects. Therefore, the Project would result in a less-than-significant impact, and no further evaluation is warranted.
- a.iii) **Less Than Significant Impact.** Liquefaction is a process by which water-saturated granular soils transform from a solid to a liquid state during strong ground shaking (City of San Diego 2024). The SDIA property is underlain by artificially placed fill comprised of relative loose to medium-dense granular soils with shallow groundwater and, thus, the potential for seismically induced liquefaction and related effects is generally high (SDCRAA 2020a). In addition, based on a review of the City of San Diego Seismic Safety Study, the SDIA property and vicinity are designated within a Hazard Category 31-Liquefaction zone, an area with high potential for liquefaction due to shallow groundwater, major drainages, and hydraulic fills (City of San Diego 2008a, 2008b). The liquefaction-induced settlements could cause extensive damage and failure of structures supported on foundations above the potentially liquefiable layers. A site-specific geotechnical investigation would be completed to describe site-specific geotechnical conditions and would provide geotechnical recommendations to address geotechnical issues related to ground failure, as needed. The geotechnical investigation would provide recommendations for the design of foundations and subgrade construction, seismic design criteria, and recommendations for the design of systems affected by geotechnical conditions, such as liquefaction. Based on the above, the Project would result in less-than-significant impacts including the risk of loss, injury, or death involving related to a seismic-related ground failure, including liquefaction; and no further evaluation is warranted.
- a.iv) **No Impact.** The Project site is level and has a low-lying topography with elevations ranging from approximately 7 feet to 15 feet mean sea level (msl; SDCRAA 2020a). Based on a review of the City of San Diego Seismic Safety Study, the SDIA property and vicinity are not located within a landslides geologic hazard category (City of San Diego 2008a, 2008b). Implementation of the Project would not result in the exposure of people or structures to the risk of landslides or exacerbate landslide risks during a seismic event. Therefore, no impacts would occur and no further evaluation is warranted.

- b) **Less Than Significant Impact.** Demolition and construction of T2E would require removal of existing pavement and buildings which would result in the temporary exposure of underlying soils. Per the requirements of the California Water Resources Control Board (SWRCB) Construction General Permit, a Storm Water Pollution Prevention Plan (SWPPP) would be implemented to reduce erosion during ground disturbing activities. Measures of the SWPPP often include such strategies as covering loose soils, utilizing only necessary amounts of water, and confirming water flow patterns on a project site.

As part of the Project, the airport apron would be reinstalled and stormwater drainage system improvements would ensure that stormwater drainage systems collect run-off from T2E apron site, Terminal roof drains, and a portion of the proposed Taxiway A safety area to the north as required by the storm drain design criteria for the project. This would route runoff in a way that would reduce erosion of soils on site. Refer to Section X, *Hydrology and Water Quality*, for a detailed discussion of soil erosion and surface runoff. Therefore, impacts related to soil erosion or loss of topsoil would be less than significant, and no further evaluation is warranted.

- c) **Less Than Significant Impact.**

#### ***Liquefaction***

As discussed in Item VII.a.iii above, the SDIA property is located within an area with high potential for liquefaction due to shallow groundwater, major drainages, and hydraulic fills (City of San Diego 2008a, 2008b). The liquefaction-induced settlements could cause extensive damage and failure of structures on the site. However, as noted above, design considerations consistent with building safety regulations would be implemented per a site-specific geotechnical investigation as a condition of the Project. There are soil and foundation design options that address the potential for differential movement due to liquefaction settlement and/or related effects such as dynamic settlement or lateral spreading. The Project design would incorporate such measures to address potential liquefaction and related effects, pursuant to recommendations in the required site-specific geotechnical investigation and building code and other regulatory standards. These measures may include standard measures to remediate liquefaction effects such as ground modification (e.g., dynamic compaction to improve on-site soil conditions) or the use of deep foundations. Therefore, impacts regarding liquefaction would be less than significant, and no further evaluation is warranted.

#### ***Subsidence***

Subsidence is characterized as a gradual or sudden sinking of ground surface relative to surrounding areas. Subsidence in areas of deep soil deposits is typically associated with withdrawal of groundwater or other fluids such as oil and natural gas. Subsidence can result in cracks and damage to underground and overlying improvements such as subsurface vaults, pipelines, and structures. The Project site is not located on a site that is considered a risk for subsidence (SDCRAA 2020a). The Project would replace older structures/buildings with new facilities, which comply with current applicable building codes, engineering specifications, and the site-specific geotechnical report that would be prepared as a condition of the Project.

Therefore, the Project site risk of subsidence is considered low, impacts would be less than significant, and no further evaluation is warranted.

### ***Landslide***

As discussed in Item VII.a.iv above, the Project site is level and has a low-lying topography. Based on a review of the City of San Diego Seismic Safety Study, the SDIA property and vicinity are not located within a landslides geologic hazard category (City of San Diego 2008a, 2008b). Implementation of the Project would not result in the exposure of people or structures to the risk of landslides or exacerbate landslide risks during a seismic event. Therefore, no impacts would occur and no further evaluation is warranted.

### ***Lateral Spreading***

Lateral spreading of the ground surface during a seismic activity may occur when potentially liquefiable soil is present in conjunction with a sloping ground surface and a “free” face (i.e., retaining wall, slope, or channel). Ground shaking leading to liquefaction of saturated soil can result in lateral spreading where the soil undergoes a temporary loss of strength. If the liquefied soil is not contained laterally, it may result in deformation or translation of the slope. Lateral spreading can result in damage to structures, pipelines, and utilities. As discussed in Item VII.a.iii above, a less than significant impact related to liquefaction and landslides from implementation of the Project would result in less than significant impacts related to lateral spreading, and no further evaluation is warranted.

### ***Collapsible Soils***

Collapsible soils shrink when they are wet and/or subject to a load. Collapsible soils tend to be young soils that have been rapidly deposited and occur in arid and semiarid areas with variable amounts of organic materials. Under the added weight of fill or buildings, these sediments can settle, causing deformation of overlying improvements such as structures, paving, and pipelines. Given that the Project site is located on fill comprised of medium-dense materials and underlain by Holocene bay deposits and the Pleistocene-age Bay Point Formation, the site is not considered susceptible to collapsible soils. Therefore, no impacts would occur, and no further evaluation is warranted.

- d) **Less Than Significant Impact.** Expansive soils are characterized by an ability to undergo changes in volume due to changes in moisture content (i.e., they expand when they get wet and shrink as they dry out). Previous studies of the SDIA property determined that the majority of the fill soils immediately underlying the SDIA property are composed of granular material that is non-expansive and suitable for use at finish grade, when properly processed, placed, and compacted (SDCRRRA 2020c). Thus, impacts regarding expansive soils would be less than significant, and no further evaluation is warranted.
- e) **No Impact.** The Project site is located in an urbanized area where existing wastewater infrastructure currently serves the SDIA property. The Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to the ability of

onsite soils to support septic tanks or alternative wastewater systems would occur, and no further evaluation is warranted.

- f) **Potentially Significant Impact.** With regard to potential impacts to paleontological resources, the previous studies of the SDIA property noted that the SDIA property was built on what was originally mudflats and bay that was subsequently raised to its current elevation over decades of dredging and placement of fill soils. Based on that, it was concluded that there is no potential for paleontological resources within the SDIA area (SDCRAA, 2020a). However, the Project's proposed ground disturbance would extend below the existing fill and would have still the potential for the unanticipated discovery of paleontological resources during ground-disturbing activities, which may result in damage or the destruction of paleontological resources that may be present below the ground surface. Therefore, impacts could be potentially significant, and further evaluation is warranted.

## References

- City of San Diego, 2008a. City of San Diego Seismic Safety Study, Geologic Hazards and Faults. Grid Tile 16. April 3, 2008. <https://www.sandiego.gov/development-services/zoning-maps/seismic-safety-study>.
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- SDCRAA. 2023. SAN Storm Water Management Plan. Adopted June 15. Amended September 2023. Accessed April 1, 2026. <https://www.san.org/wp-content/uploads/2025/08/September-2023-SWMP-Main-Body-and-Figures.pdf>.

## Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VIII. GREENHOUSE GAS EMISSIONS</b> — Would the project:				
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"/>

### Discussion

- a-b) **Potentially Significant Impact.** Construction of the Project would generate greenhouse gas (GHG) emissions from construction-related activities, off-road construction equipment, construction workers trips, and haul/vendor truck trips. During operations, the Project would generate GHG emissions from energy use associated with lighting and heating, ventilation, and air conditions (HVAC) equipment, solid waste disposal, and electricity used to supply water to the T2E and to deliver wastewater to wastewater treatment facilities. However, it is noted that the Project would not result in changes to aircraft operations, including flight frequency, flight paths, or runway usage. As a part of the Authority’s Sustainability Policy, all new facilities on airport grounds also must be certified LEED Silver or better. The emission of GHGs could have the potential to individually or cumulatively result in a significant impact on the environment. Therefore, implementation of the Project could result in potentially significant impacts related to greenhouse gases and further evaluation is warranted.

Although SDIA is not subject to City of San Diego regulations, for purposes of consistency with local neighboring jurisdictions, assessment of applicable local policies and ordinances from the City of San Diego were addressed. The Project would align with the City of San Diego’s General Plan policies relating to GHG emissions, including any policies related to energy efficiency, water efficiency, and stationary source emissions. Additionally, the Project would align with policies and strategies required by the City of San Diego Climate Action Plan. In addition, the Project would implement applicable energy and resource conservation measures to reduce GHG emissions such as those described in CARB’s 2022 Scoping Plan and supporting documents, which describes the approaches the State will take to achieve targets for carbon neutrality by 2045 and reduce GHG emissions by 85% below 1990 levels by 2045 in accordance with AB 1279. As such, implementation of the Project could result in potentially significant impacts related to greenhouse gases and further evaluation is warranted.

### References

N/A

## Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IX. HAZARDS AND HAZARDOUS MATERIALS —</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

a-b) **Potentially Significant Impact.** The primary hazards and hazardous materials issues associated with the Project would be the potential presence of hazardous building materials (e.g., asbestos-containing materials [ACM] and lead-based paint [LBP]) that may be encountered during demolition of the existing T2E. This warrants additional evaluation to determine the presence of these materials in the structure to be demolished and ultimately disposed of as part of the Project. Although hazardous materials would be used during the construction of structures and the demolition of structures, the transportation, use, storage, and disposal of hazardous materials is heavily regulated and compliance with the law is anticipated to reduce risks of exposure. Therefore, implementation of the Project could result in potentially significant impacts related to creating a significant hazard to the public or the environment through the disposal of hazardous materials and from a reasonably foreseeable accident condition related to the dispersal of ACM or LBP, and further evaluation is warranted in the EIR.

- c) **Less than Significant Impact.** There is one school located within 0.25 mile of the Airport boundaries, although it is approximately 0.5 mile from the construction area. Montessori School of San Diego is located at approximately 0.22 mile to the northeast of the Airport boundary, on the other side of Interstate 5 (I-5) from SDIA. The next closest school to SDIA is High Tech Elementary, located at 2150 Cushing Road, approximately 0.8 miles west of SDIA and High Tech High School, located at 2861 Womble Road, approximately 1 mile west of SDIA. The Project is located in the existing airport property, between two existing terminals. Hazardous materials encountered would be handled per regulatory requirements and would not significantly impact sensitive receptors located outside of the SDIA property. As all hazardous materials would be managed in compliance with regulations and oversight related to spills, transport, and use, there would be less than significant impacts related to the emissions of or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school, and no further evaluation is warranted.
- d) **Less than Significant Impact.** The SDIA property has been identified on numerous databases of occurrences of soil and groundwater contamination. However, these cases have been remediated and closed (SWRCB 2026, DTSC 2026). The SDIA property is not listed on the Cortese List (CalEPA 2026). Therefore, the Project would have less than significant impacts related to the creation of a significant hazard to the public or the environment from being located on a listed hazardous waste site, and no further evaluation is warranted.
- e) **Less Than Significant Impact.** The Project is located within SDIA Airport Influence Area (AIA) as defined by the SDIA Airport Land Use Compatibility Plan (ALUCP; SDCRAA 2025). The purpose of an ALUCP is to protect the operations of the airport and concurrently safeguard the welfare of inhabitants and the general public within the vicinity of the airport. The ALUCP accomplishes these objectives by establishing a geographic scope of application (the AIA) and criteria for the compatibility of specific land uses within the AIA. The compatibility standards are based upon sensitivity of land uses to airport noise exposure, minimizing risk in the event of aircraft accidents, protection of airspace from hazards and obstructions to flight and airport operations, and residential awareness of airport proximity to minimize annoyance. The ALUCP does not regulate airport operations, nor does it have any impact on existing land uses. The ALUCP applies only to land use plans and new projects proposed after adoption of the ALUCP. The ALUCP's land use authority does not apply to SDIA as all uses and improvements are regulated by FAA. Construction activities would be coordinated with FAA through the use of Form FAA 7460-1 (Notice of Proposed Construction or Alteration). This form is used by the FAA to assess the effect of the proposed construction or alteration on safety in air commerce. All construction activities would comply with applicable aviation-related safeguards, and thus would not create a safety hazard. Additionally, SDIA would remain operational during Project construction which would not result in a substantial change in the noise environment (i.e. planes) such that excessive noise would impact workers and residents. Therefore, implementation of the Project would result in less than significant impacts related to exposing people working or residing near the Project site to a safety hazard or excessive noise, and no further evaluation is warranted in the EIR.

- f) **Less Than Significant Impact.** The Project proposes the modernization of T2E, which would enhance airport functionality, passenger experience, and operational efficiency by addressing critical challenges, including limited operational flexibility and support spaces, capacity constraints, long wait times, and inefficient circulation. The Project would be designed to provide adequate access for emergency responders and egress for visitors and employees. These objectives of the modernization would serve to improve emergency response during operations and therefore would not impair the ability of the Authority to implement the SDIA Airport Operational Safety & Security Requirements (SDCRAA 2026). In addition, the Authority also maintains a Rules and Regulations manual which subjects any use or entry into the airport by any person or entity for any commercial or business purpose to comply with the Airport Security Program (SDCRAA 2026). Implementation of the Project would not interfere with the implementation of the Rules and Regulations.

Construction activities would occur within the boundaries of the SDIA property, which are subject to notification regulations. During construction, access routes in and out of the SDIA property would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Fire Code regulations. Therefore, any temporary lane closures and other construction activities would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. In summary, implementation of the Project would result in less than significant impacts related to the implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan, and no further evaluation is warranted.

- g) **No Impact.** As discussed in Section XX, *Wildfire*, below, according to the California Department of Forestry and Fire Protection (CALFIRE) and as identified by the State Fire Marshall, the Project site is not located within a Local Responsibility Area (LRA) or a State Responsibility Area (SRA) Fire Hazard Severity Zone (FHSZ) (CALFIRE 2025, 2024). Wildland fire is an overarching term describing any non-structure fire that occurs in vegetation and natural fuels (NPS 2026). SDIA is surrounded by land uses that have a low risk of wildland fire impacts, including urbanized areas and military facilities where vegetation and landscaped areas are regularly maintained. Therefore, there would be no impacts related to the exposure of people or structures to hazards associated with wildland fires with implementation of the Project and no further evaluation is warranted.

## References

- California Department of Forestry and Fire Protection (CALFIRE). 2024. State Responsibility Area Fire Hazard Severity Zones, San Diego County. April 1, 2024.
- California Environmental Protection Agency (CalEPA). 2026. 2026 Cortese List- Site Cleanup Program. Available online at: [https://calepa.ca.gov/wp-content/uploads/2026/03/2026\\_scp\\_cortese.list\\_lat.long\\_.pdf](https://calepa.ca.gov/wp-content/uploads/2026/03/2026_scp_cortese.list_lat.long_.pdf), accessed April 16, 2026.
- CALFIRE. 2025. Local Responsibility Area Fire Hazard Severity Zones, City of San Diego, San Diego County. March 24, 2025.

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Department of Toxic Substances Control (DTSC). 2026. EnviroStor. Available online at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed April 16, 2026.

National Park Service, 2026. Wildfires, Prescribed Fires, and Fuels. Webpage. Accessed April 16, 2026. <https://www.nps.gov/orgs/1965/wildfires-prescribed-fires-fuels.htm#:~:text=Wildland%20fire%20is%20an%20overarching,fire%20to%20meet%20park%20objectives>.

SDCRAA. 2026. Rules and Regulations. Accessed April 16, 2026. <https://www.san.org/wp-content/uploads/2026/03/Rules-Regulations.pdf>.

SDCRAA. 2025. San Diego International Airport. Accessed April 17, 2026. <https://www.san.org/wp-content/uploads/2025/08/SDIA-ALUCP.pdf>.

SDCRAA. 2020. Recirculated Draft Environmental Impact Report for the Airport Development Plan, Chapter 3.10, Hydrology and Water Quality. Accessed April 1, 2026. <https://www.san.org/airport-planning/>.

SDCRAA. 2015. SAN Storm Water Management Plan, amended 2023. Accessed April 16, 2026. <https://www.san.org/wp-content/uploads/2025/08/September-2023-SWMP-Main-Body-and-Figures.pdf>.

State Water Resources Control Board (SWRCB). 2026. Geotracker. Available online at: <https://geotracker.waterboards.ca.gov/>, accessed April 16, 2026.

## Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>X. HYDROLOGY AND WATER QUALITY —</b>				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<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 through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Construction of the Project would include activities involving the use of chemicals and other potential water quality pollutants, such as paints, solvents, adhesives, concrete curing additives, and other such compounds, which if released to, and/or become entrained in stormwater runoff, could lead to a violation in water quality standards or waste discharge requirements. However, the Project would be required to prepare geotechnical reports, and hydrology and drainage reports in compliance with the CBC and local requirements. This includes the requirements of the SWRCB Construction General Permit, which requires construction projects with coverage under the Construction General Permit to implement a Stormwater Pollution Prevention Plan (SWPPP). In addition, the Project would be subject to the requirements of a National Pollutant Discharge Elimination Permit (NPDES) and the SDIA Storm Water Management Plan, which provide framework for operation of existing facilities and development of new facilities at SDIA to comply with applicable water quality permits, standards, and regulations. Nonetheless, implementation of the Project could result in potentially significant impacts, and further evaluation is warranted in the EIR.

- b) **Less than Significant Impact.** Previous studies of the SDIA have noted that groundwater depths at the SDIA property range from approximately 7 to 12 feet below ground surface. Recharge of the groundwater is minimal since most of the land at the SDIA property is paved and impervious (SDCRAA 2020). During construction, the Project has the potential to require dewatering, particularly for subsurface utilities improvements. Such dewatering may result in groundwater impacts. Operation of the Project would rely on water from the City of San Diego and would not require the use of local groundwater. Since the Project would not increase impervious surfaces outside of the existing footprint, there would be no impacts to local groundwater recharge. The Project would not decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Therefore, impacts would be less than significant and no further evaluation is warranted.
- c.i-iv) **Potentially Significant Impact.** The Project improvements expand the existing terminal footprint. While the Project site is currently developed with impervious surfaces, the proposed reconfiguration of the building footprint and the reconstruction of the aircraft parking aprons may alter existing localized drainage patterns and flow directions within the airport's watershed, which may result in substantial erosion of uncovered areas on the property. The SDIA property includes a stormwater system that includes the Stormwater Capture and Reuse System and compliance with the MS4 Permit. The Project would potentially increase runoff patterns and volumes, thereby affecting the peak flow rates and volumes entering the SDIA's drainage infrastructure. Therefore, the Project has the potential to exceed the capacity of existing or planned stormwater systems or introduce substantial additional sources of polluted runoff during construction or operation. Because implementation of the Project could result in potentially significant impacts, further evaluation is warranted in the EIR.
- d) **No Impact.** Based on the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL) Viewer, the Project site is not located within a flood hazard zone (FIRM No. 6073C1877H; FEMA 2026). The SDIA property is mapped as Zone X, "areas determined to be outside a 500-year floodplain" (FEMA 2026). Thus, the Project site is not located within a flood hazard zone. Furthermore, the SDIA property is not located within a tsunami inundation area (CGS 2026). Therefore, there would be no impact related to flood hazard, tsunami, or seiche zones, and the risk release of pollutants due to Project inundation, and no further evaluation is warranted.
- e) **Potentially Significant Impact.** The Project site is located within the SDIA, which is subject to the Water Quality Control Plan for the San Diego Basin (Basin Plan). The Project involves substantial land-disturbing activities, including the full replacement of the T2E concourse and the reconstruction of aircraft parking aprons. These activities must comply with the NPDES requirements and the MS4 Permit. The SDCRAA is a Co-Permittee under the MS4 Permit and must implement a Water Quality Improvement Plan (WQIP) for the San Diego Bay Watershed Management Area.

While the Project would be designed to meet current SDCRAA Storm Water Standards and achieve high-level sustainability certifications, the scale of the Project—which involves significant modifications to the terminal's façade and airside drainage—could potentially

interfere with established water quality objectives if not properly managed. Furthermore, although the SDIA is not located within a high-priority groundwater basin subject to a Sustainable Groundwater Management Plan, the potential for construction-related dewatering and the management of runoff during construction activities must be evaluated to ensure no conflict with regional water quality goals. Therefore, implementation of the Project could result in potentially significant impacts, and further evaluation is warranted in the EIR.

## References

- Federal Emergency Management Agency (FEMA). 2026. FEMA's National Flood Hazard Layer (NFHL) Viewer. Accessed April 3, 2026. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-95.45126763363174,29.70432951603742,-95.44609633465032,29.70665923986828>.
- California Geological Survey (CGS). 2026. Tsunami Hazard Area Map. Accessed April 3, 2026. [https://maps.conservation.ca.gov/cgs/informationwarehouse/ts\\_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm\\_source=cgs+active&utm\\_content=losangeles](https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles).
- SDCRAA. 2020. Recirculated Draft Environmental Impact Report for the Airport Development Plan, Chapter 3.10, Hydrology and Water Quality. Accessed April 3, 2026. <https://www.san.org/airport-planning/>.
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## Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XI. LAND USE AND PLANNING —</b> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **No Impact.** The Project proposes modifications to T2E within the existing SDIA property and would not propose any expansion outside of its existing boundaries. Therefore, the Project would not result in physical division of an established community and there would be no impact; no further evaluation is warranted.
- b) **Less Than Significant Impact.** The General Plan land use designation for the Project site is Institutional & Public and Semi-Public Facilities (City of San Diego 2024, Figure LU-2). Permitted uses within this land use designation include “airports, military facilities, community colleges, university campuses, landfills, communication and utilities, transit centers, water sanitation plants, schools, libraries, police and fire facilities, cemeteries, post offices, hospitals, park-and-ride lots, government offices, and civic centers” (City of San Diego 2004, Table LU-4). Additionally, the Project site is within the Airport Land Use Compatibility Overlay Zone, which permits airport related operations, pursuant to San Diego Municipal Code Section 132.1510, Table 132-15E. The Project proposes the modernization and reconstruction of T2E. These proposed improvements would not conflict with the current land use designation and overlay zone. Therefore, there would be less than significant impacts related to a conflict with an applicable land use plan, policy, or regulation of a local agency with jurisdiction over a project that has been adopted for the purpose of avoiding or mitigating an environmental effect would occur with the implementation of the Project; no further evaluation is warranted.

## References

- Airport Land Use Commission (ALUC). 2025. San Diego International Airport, Airport Land Use Compatibility Plan. Adopted February 13, 2025. <https://www.san.org/wp-content/uploads/2025/08/SDIA-ALUCP.pdf>.
- City of San Diego. 2024. 2024 General Plan Land Use Element. Adopted 2008. Amended 2024. Accessed March 27, 2026. [https://www.sandiego.gov/sites/default/files/2025-06/general-plan\\_02\\_land-use\\_june-2025.pdf](https://www.sandiego.gov/sites/default/files/2025-06/general-plan_02_land-use_june-2025.pdf).
- San Diego Municipal Code. Article 2, Division 15, Section 132.1510. Table 132-15E, Noise Compatibility Criteria for San Diego International Airport. Accessed March 27, 2026. <https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art02Division15.pdf>.

## Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XII. MINERAL RESOURCES</b> — 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?	<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"/>

## Discussion

- a-b) **No Impact.** According to the City of San Diego General Plan Conservation Element, Figure CE-6, *Generalized Mineral Land Classification*, the Project site is within the Mineral Resource Zone 1 (MRZ-1; City of San Diego 2024). MRZ-1 zones are “[a]reas where available geological information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence” (SANDAG 2025). Additionally, as an active airport, no mineral resources extraction activities currently take place on the SDIA site. The Project would not result in the loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally important mineral resource recovery sites. Therefore, no impacts related to the loss of availability of a known, valued mineral resources would occur with the implementation of the Project and no further evaluation is warranted.

## References

- City of San Diego. 2024. 2024 General Plan Conservation Element. Adopted 2008. Amended 2024. Accessed March 27, 2026. [https://www.sandiego.gov/sites/default/files/2024-07/general-plan\\_08\\_conservation\\_july-2024.pdf](https://www.sandiego.gov/sites/default/files/2024-07/general-plan_08_conservation_july-2024.pdf).
- San Diego Association of Governments (SANDAG). 2025. 2025 Regional Plan Program Environmental Impact Report. Chapter 4.12, Mineral Resources. Accessed March 27, 2026. <https://www.sandag.org/regional-plan/2025-regional-plan/2025-regional-plan-environmental-impact-report>.

## Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIII. NOISE</b> — Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Therefore, construction of the Project could generate a temporary or permanent increase in ambient noise levels in excess of applicable standards for nearby noise sensitive receptors. Therefore, impacts could be potentially significant, and further evaluation is warranted in the EIR.

The Project consists of terminal improvements and associated landside and airside modifications; it would not result in changes to aircraft operations, including flight frequency, flight paths, or runway usage. As aircraft operations are the predominant source of noise in the Project area, and these would remain unchanged, the Project would not result in a substantial increase in long-term ambient noise levels in excess of applicable standards for nearby noise sensitive receptors. Therefore, impacts would be less than significant and further evaluation is not warranted in the EIR.

- b) **Potentially Significant Impact.** Construction of the Project may generate groundborne vibration and groundborne noise due to Project site grading, clearing activities, shoring, and haul truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and groundborne noise levels during short-term construction activities. Therefore, this topic will be further analyzed in an EIR. Operation of the Project also could potentially generate groundborne vibration or groundborne noise at levels beyond those which currently occur under existing conditions due to vehicular trips, outdoor activities or other factors and further evaluation is warranted in the EIR.
- c) **Less than Significant Impact.** The Project site is located within an active airport environment where existing ambient noise is dominated by aircraft overflight activity. Surrounding land uses are subject to elevated noise levels, and the area is governed by the Airport Land Use Compatibility Plan (ALUCP), which establishes safety and noise compatibility zones that restrict or conditionally allow noise-sensitive land uses in recognition of these conditions.

The Project would not introduce new noise-sensitive receptors into high-noise areas, nor would the Project result in altering land use compatibility within designated safety zones. The ALUCP's land use authority does not apply to SDIA as all uses and improvements are regulated by FAA. Construction activities would be coordinated with FAA through the use of Form FAA 7460-1 (Notice of Proposed Construction or Alteration). In addition, the Project consists of terminal improvements and associated landside and airside modifications; it would not result in changes to aircraft operations, including flight frequency, flight paths, or runway usage. As aircraft operations are the predominant source of noise in the Project area, and these would remain unchanged, the Project would not result in a measurable increase in long-term ambient noise levels at off-site sensitive receptors. Ground-based operational noise associated with the project would be minor relative to existing aircraft noise and would not substantially contribute to ambient noise levels. Therefore, impacts would be less than significant and further evaluation is not warranted in the EIR.

## References

N/A

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## Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIV. POPULATION AND HOUSING —</b> Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

- a) **Less than Significant Impact.** The Project proposes the modernization and reconstruction of the existing T2E within the SDIA existing footprint. The Project would not introduce new access to the airport via the extension of roads and other infrastructure that has the potential to change surrounding land uses in a way that would induce growth. Construction of the Project would result in the temporary creation of new construction jobs; however, these positions are expected to be filled locally from the San Diego region labor force and would not directly or indirectly induce population growth in the area. Therefore, Project impacts from the inducement of substantial unplanned population growth would be less than significant and no further evaluation is warranted.
- b) **No Impact.** The Project proposes the modernization and reconstruction of the T2E, which is located within the SDIA property. The Project does not impact existing housing and does not propose the construction of replacement housing elsewhere. Implementation of the Project would not displace existing housing or people in the area surrounding the SDIA. Therefore, no impacts from the construction of replacement housing would occur which may cause environmental impacts with the implementation of the Project and no further evaluation is warranted.

### References

N/A

## Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XV. PUBLIC SERVICES —</b>				
a) 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 following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

The public services impacts analysis for the Project is based on whether conditions under the Project would meet key response time and capability criteria set forth by the City, San Diego Fire-Rescue Department (SDFD), San Diego Police Department (SDPD), San Diego Harbor Police Department (SDHPD), and by state and federal regulations. As there are no uniform methods or standards for projecting long-range staffing needs at SDIA, this analysis does not include quantitative estimates of demand for additional fire and law enforcement personnel. Staffing needs are determined through ongoing evaluation by these agencies (SDCRAA 2020).

- a.i) **Less Than Significant Impact.** The Project would reconstruct T2E to enhance terminal efficiency and passenger experience. The Project would not change the number of gates from existing conditions despite the proposed expanded footprint of T2E and would not warrant additional fire protection services beyond current demand as it would not increase the number of people served. Fire protection at SDIA would continue to be served by SDFD who provides emergency response services at the airport (SDCRAA 2025). Therefore, impacts to the environment from the construction of new fire protection facilities would be less than significant and no further evaluation is warranted.
- a.ii) **Less Than Significant Impact.** The SDHPD provides police protection services for SDIA under contract with the Authority (California Public Utilities Code §170062(e)). An office of the SDHPD is located within SDIA. Level 1 of T2E was renovated in 2022 and supports airport operations, airline staff, and public services through multiple office functions. While the Project would relocate the waiting area for the SDHPD, Lost and Found, and Access Control Office offices, the footprint of the SDHPD office would remain unchanged; thus, the Project improvements would not result in substantial effects to existing police protection facilities. The SDIA-based SDHPD offices are sufficient to supporting the existing staffing that provides police protection services SDIA. The Project would not change the number of gates from existing

conditions despite the proposed expanded footprint of T2E and would not warrant additional police protection services beyond current demand as it would not increase the number of people served. Therefore, physical impacts associated with the construction of police protection facilities associated with the implementation of the Project would be less than significant and no further evaluation is warranted.

- a.iii) **No Impact.** Implementation of the Project would not directly or indirectly induce substantial unplanned population growth in the area. The Project would not include residential development and thus would not contribute to a decrease in school capacity in a way that would warrant additional educational campuses to be constructed. Therefore, no physical environmental impacts would occur related to the construction of school facilities and no further evaluation is warranted.
- a.iv) **No Impact.** Implementation of the Project would not directly or indirectly induce substantial unplanned population growth in the area that would increase demand for neighborhood or regional parks in a way that would warrant construction of new parklands. Therefore, no physical environmental impacts would occur related to the construction of park facilities and no further evaluation is warranted.
- a.v) **Less than Significant Impact.** The Project proposes upgraded streetscape design, ADA-compliant access, and targeted pedestrian safety enhancements to the public sidewalk fronting T2E to better manage growing curbside activity. However, these improvements would be within the existing footprint of the sidewalk and any potential adverse physical environmental impacts related to that work have been assessed within the other sections of this Initial Study. Therefore, the Project would result in less than significant impacts from the construction of public facilities (sidewalks at SDIA) and no further evaluation is warranted.

## References

SDCRAA. 2020. Recirculated Draft Environmental Impact Report for the Airport Development Plan, Chapter 3.13, Public Utilities. Accessed April 15, 2026. <https://www.san.org/airport-planning/>.

SDCRAA. 2025. Safety and Security. Website. Accessed April 15, 2026. <https://www.san.org/safety-and-security/>.

Port of San Diego. 2025. Harbor Police FAQ. Website. Accessed April 15, 2026. <https://www.portofsandiego.org/public-safety/harbor-police-faq>.

## Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVI. RECREATION —</b>				
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 type="checkbox"/>	<input checked="" 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"/>

## Discussion

- a-b) **No Impact.** The Project does not propose recreational facilities nor does it include residential development which would increase the use of local recreational facilities by residents. Although the Project would provide new long-term employment opportunities as a result of the construction of the Project, it is anticipated that the labor force would be staffed locally. The Project would not directly or indirectly induce population growth in the area such that increased demand for neighborhood and regional parks or other recreational facilities would occur. In addition, as an airport facility, it is unlikely for airport users (drivers picking up and dropping of passengers, employees, and the flight passengers themselves) to also be utilizing recreational facilities nearby in between layovers and flights. Based on the above, the Project would not result in substantial physical deterioration of existing recreational facilities in the area or require the construction or expansion of recreational facilities, the construction of which would cause adverse physical environmental effects. Therefore, no impacts related to recreational facilities would occur with the implementation of the Project and no further evaluation is warranted.

## References

N/A

## Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVII. TRANSPORTATION —</b> Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less than Significant Impact.** The Project would not conflict with transportation planning documents related to SDIA, including: the SDIA Regional Aviation Strategic Plan (RASP) and the Airport Multimodal Accessibility Plan (AMAP). The RASP was intended to align with the development of an AMAP by SANDAG, and both plans were to be compatible with SANDAG's 2050 Regional Transportation Plan (RTP), which was finalized in 2011. The AMAP was developed in 2011 and updated in 2021 as an appendix to the RTP; the AMAP develops ground access improvements alternatives as identified in the RASP. The Authority published a report in 2021 to document the region's collective progress in implementing the RASP and its continued compatibility with SANDAG's regional transportation planning efforts (SDCRAA 2025). The Airport Development Plan (ADP) was reviewed to derive the forecasts consolidated in the RASP Implementation Report, of which this Project is a part. The Project would implement airfield upgrades consistent with the ADP to increase airfield functionality and thus would be inherently consistent with the RASP, AMAP, and RTP. Therefore, impacts from a conflict with a program, plan, ordinance or policy would be less than significant and no further evaluation is warranted.
- b) **Less than Significant Impact.** Airport trip generation is highly correlated with flight activity; as flights increase, all trips would increase, including passenger arrivals and departures, employee trips, deliveries, rental car activity, shuttle buses, taxis, and other modes of travel. Increase in building size is a less reliable indicator of trip generation at an airport; instead, it provides more room for an airport to operate efficiently. The Project encompasses a modernization of the T2E headhouse, concourse, landside, airside, and supporting utilities; the Project would not result in changes to aircraft operations, including flight frequency, flight paths, or runway usage.. Proposed landside improvements focus on maximizing functionality and security within the constraints of the existing curb and building lines. Airside improvements would include replacement of apron pavement, grading, and the full replacement of passenger loading bridges and critical infrastructure to accommodate a broader and more flexible aircraft fleet mix. These improvements would not result in a change to the number of vehicular trips from or to SDIA and thus would not change vehicle miles traveled (VMT) in a way that would result in a significant impact per the City of San Diego Level of Service (LOS) threshold. Therefore, the Project would have less than significant impacts related to VMT, and further evaluation is not warranted.

- c) **Less than Significant Impact.** The Project would not implement any roadway improvements that would increase hazards due to a geometric design feature. Airside improvements would include replacement of apron pavement, grading, and the full replacement of passenger loading bridges and critical infrastructure to accommodate a broader and more flexible aircraft fleet mix. Apron reconstruction and striping would also be included to accommodate the future extension of Taxiway Alpha and integration with a planned fuel hydrant system. This work would reduce design hazards of the existing apron by reconfiguring aircraft layouts at the gates. Landside improvements include upgraded streetscape design, ADA-compliant access, and targeted pedestrian safety enhancements to better manage growing curbside activity, including exterior lighting, wayfinding, regulatory signage and a buffer zone equipped with physical protection elements and hardened façade treatments along the T2E frontage. This would reduce pedestrian/vehicle conflicts along the roadside from existing conditions. Therefore, the Project would result in less than significant impacts related to hazards from geometric design features and no further evaluation is warranted.
- d) **Less Than Significant Impact.** The Project proposes the modernization and reconstruction of T2E, including improvements to the airside and landside along the T2E frontage. T2E would be constructed to building standards which would include adequate emergency access to the terminal. The Project would provide access to law enforcement/first responder directly to the SDIA security zones. Therefore, implementation of the Project would result in less than significant impacts related to emergency access, and no further evaluation is warranted.

## References

- San Diego Association of Governments (SANDAG), 2025. San Diego County 2025 Regional Plan. Accessed April 14, 2026. <https://www.sandag.org/regional-plan/2025-regional-plan>.
- San Diego County Regional Airport Authority (SDCRAA), 2025. Understanding the RASP and Its Role in Regional Planning. Webpage. Accessed April 15, 2026. <https://www.san.org/airport-planning/#airportplanning>.
- San Diego County Regional Airport Authority (SDCRAA), 2025. Regional Aviation Strategic Plan Implementation Report. Accessed April 15, 2026. <https://www.san.org/wp-content/uploads/2025/08/RASP-Implementation-Report-%E2%80%93-Final.pdf>.

## Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVIII. TRIBAL CULTURAL RESOURCES —</b>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

a.i-ii) **Potentially Significant Impact.** Pursuant to AB 52, SDCRAA will conduct consultation with Native American Tribes who have requested to be informed of activities initiated by SDCRAA. There is a potential for the Project to affect tribal cultural resources during ground-disturbing activities associated with construction. The EIR will evaluate potential impacts to tribal cultural resources and incorporate the results of AB 52 consultations into the analysis. Therefore, impacts could be potentially significant and further evaluation is warranted.

### References

N/A

## Utilities and Service Systems

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

### Discussion

- a) **Less than Significant Impact.** The Project involves the modernization of the T2E which would require the relocation of existing utilities and the installation of new utility infrastructure, including water, wastewater, and storm water drainage systems. The reconstruction of aircraft parking aprons and associated drainage may conflict with existing subterranean electric power, natural gas, and telecommunications lines and would require relocation. However, as this would occur within the footprint of the existing apron and T2E, construction would be subject to standard construction measures that would reduce construction-related impacts. As these improvements would occur within the existing SDIA property, it is not anticipated to cause significant environmental impacts. Therefore, impacts would be less than significant and no further evaluation is warranted.
- b) **Potentially Significant Impact.** The Project must be evaluated to ensure that sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The apron level of T2E contains a pump room where tertiary chilled and hot water distribution pumps are located to provide chilled and hot water for the various HVAC systems from the Central Utility Plant (CUP) located on the SDIA property. The current operating cooling capacity of the CUP is estimated at 5,175 tons. The remaining 175-tons of potential cooling capacity would likely not be enough to accommodate the additional loads associated with the T2E modernization (Landrum & Brown 2019). Therefore, potentially significant impacts could occur related to having sufficient water supplies available to serve the Project and impacts will be further evaluated.

- c) **Potentially Significant Impact.** The modernization and expansion of T2E would potentially generate more wastewater and would require evaluation of impacts to the capacity of the existing system. Sanitary sewer service to the airport facilities is provided by the City of San Diego and owned and maintained by the Authority within the apron and airside area (Landrum & Brown 2019). Since the City of San Diego is the wastewater treatment provider for SDIA, a determination letter would be requested to confirm that the agency has adequate capacity to manage the Project's projected peak demands in addition to existing commitments. This could result in potential significant impacts from a wastewater capacity standpoint and warrants further evaluation.
- d) **Less than Significant Impact.** Airport operations contribute to regional waste generation. At the current rate of disposal, the only City-run landfill, the Miramar Landfill, will likely be filled to capacity and closed by 2030 per the Zero Waste Plan (ZWP; SDCRAA 2020).

The demolition of the existing T2E concourse and the subsequent construction would generate a substantial volume of solid waste, including concrete, steel, and architectural debris from excavation, and/or the construction, demolition, renovation or repair of structures, the apron, and utilities. However, all construction at the SDIA property is subject to the standards of the ZWP (SDCRAA 2020), which, with implementation of its measures, has achieved a diversion rate of approximately 90.4 percent of construction and demolition debris. The ZWP serves as the Authority's strategy and plan for managing various waste issues and covers all waste, including Construction and Demolition (C&D). As a part of the Authority's Sustainability Policy, all new facilities on airport grounds also must be certified LEED Silver or better, which requires at least a 90 percent recycling rate of C&D waste.

In general, operational sources of waste at the Airport include: terminal and administrative office operations, aircraft and cargo hangers, landscape maintenance, facilities and equipment maintenance, food service, aircraft flights, and airside ramp operations. As the Project proposes the modernization and expansion of T2E, additional solid wastes above existing conditions may be generated. However, with implementation of the strategies of the ZWP, the Project's solid waste generation would not exceed State or local standards or the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals of the Authority and City of San Diego. Impacts would be less than significant and no further evaluation is warranted.

- e) **Less than Significant Impact.** As noted under the analysis for XIX(d), the Project would be subject to the performance design requirements of the SDIA ZWP as part of the Authority's waste reduction program. The SDIA utilizes an efficient centralized recycling and waste disposal facility, robust food waste diversion and edible food donation programs, and a SAN Green Concessions Program that incentivizes maximum participation in tenant waste and recycling efforts. Other Authority-produced documents that address waste include the Sustainability Policy (updated 2019), a Commercial Letter to comply with City of San Diego Ordinance O-2008-30, and Rules and Regulations at San Diego International Airport (SDCRAA 2020). Project compliance with the ZWP and associated goals and initiatives also addresses compliance with other state and regional plans, policies, and programs including, but not limited to: Bottle Bill / Beverage Container Recycling Program (AB 2020, 1986), Plans and Binding City/County Goals,

Integrated Waste Management Act (AB 939, 1989), Mandatory Commercial Recycling, California Global Warming Solutions Act (AB 32, 2006) Statewide Recycling by 2020, Mandatory Commercial Recycling (AB 341, 2011), Mandatory Commercial Organics Recycling (AB 1826, 2014), Organics Waste Reduction by 2025, and Local Mandates (SB 1383, 2016) Recycling/Organics Integrated into State Greenhouse Gas Law (SB 32, Updated in 2016). Required compliance with these regulations regarding solid waste would result in a less than significant impact and further evaluation of impacts is not warranted.

## References

SDCRAA, 2020. Zero Waste Plan (ZWP). July. Accessed April 13, 2026. [https://www.san.org/wp-content/uploads/2025/08/2020\\_Zero-Waste-Plan-min.pdf](https://www.san.org/wp-content/uploads/2025/08/2020_Zero-Waste-Plan-min.pdf)

Landrum & Brown, 2019. Project Development Plan (PDP). Accessed April 13, 2026.

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# Wildfire

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

## Discussion

a-d) **No Impact.** According to the California Department of Forestry and Fire Protection (CALFIRE) Local Responsibility Area Fire Hazard Severity Zone Map, and as identified by the State Fire Marshall, the Project site is not located within a Local Responsibility Area (LRA) Fire Hazard Severity Zone (FHSZ; CALFIRE 2025). Similarly, the Project site is not located within a State Responsibility Area (SRA) FHSZ (CALFIRE 2024). Therefore, no impacts would occur related to wildfire hazards and no further evaluation is warranted.

## References

California Department of Forestry and Fire Protection (CALFIRE). 2024. State Responsibility Area Fire Hazard Severity Zones, San Diego County. April 1, 2024.

CALFIRE. 2025. Local Responsibility Area Fire Hazard Severity Zones, City of San Diego, San Diego County. March 24, 2025.

## Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE —</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<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? (“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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- a) **Potentially Significant Impact.** As discussed in Section IV, *Biological Resources*, above, the Project is located within a highly developed airport environment and is not expected to reduce habitats or eliminate plant and animal communities. However, as detailed in Section V, *Cultural Resources*, and Section XVIII, *Tribal Cultural Resources*, the Project involves substantial ground disturbance. Because the Project is located in an area of high archaeological sensitivity near the historic San Diego Bay shoreline, these ground-disturbing activities have the potential to encounter and eliminate important examples of California prehistory or undocumented tribal cultural resources. Therefore, the Project has the potential to degrade the quality of the environment related to cultural resources and tribal cultural resources, and further evaluation in the EIR is warranted.
  
- b) **Potentially Significant Impact.** The Project would occur concurrently with or following several major capital improvement projects at SDIA, most notably the ADP. The Project's incremental contributions to regional air quality, noise, traffic, and utilities and service system demands—when combined with the broader ADP and nearby Port of San Diego projects—could be cumulatively considerable. The EIR would include a cumulative impact analysis to determine if the Project’s contribution to these regional environmental stressors exceeds significance thresholds when viewed in connection with other probable future projects. Therefore, impacts could be potentially significant, and further evaluation is warranted in the EIR.
  
- c) **Potentially Significant Impact.** The Project aims to improve passenger experience and operational efficiency; however, the construction and operation activities of the Project could result in environmental effects that directly or indirectly impact human beings. Specifically, potential impacts related to air quality and GHG emissions from construction equipment, increased noise levels, and potential encounters with hazardous materials during the demolition of

existing T2E structures could affect airport workers, travelers, and nearby sensitive receptors. Because the Project has the potential to result in substantial adverse effects on human beings, impacts could be potentially significant, and further evaluation is warranted in the EIR.

## References

N/A

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