



**Date of Notice:** February 7, 2019

**PUBLIC NOTICE OF PREPARATION OF A  
PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SCOPING MEETING  
PLANNING DEPARTMENT**

---

**PUBLIC NOTICE:** The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a PEIR and Scoping Meeting was publicly noticed and distributed on February 7, 2019. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at:

<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>, and on

the Planning Department website at:

<https://www.sandiego.gov/planning/programs/ceqa>

**SCOPING MEETING:** The City of San Diego Planning Department will hold a public scoping on **Wednesday February 27th** from 6:00 PM to 7:30 PM at the Otay Mesa-Nestor Branch Library, located at 3003 Coronado Avenue, San Diego, CA 92154. **Please note that depending on the number of attendees, the meeting could end earlier than 7:30 PM.** Written comments regarding the proposed PEIR's scope and alternatives will be accepted at the meeting.

Written/mail-in comments may also be sent to the following address: **Rebecca Malone, Environmental Planner, City of San Diego Planning Department, 9485 Aero Drive, MS 413, San Diego, CA 92123** or **e-mail your comments to [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov) with the Project Name in the subject line** no later than March 9, 2019. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A PEIR incorporating public input will then be prepared and distributed for public to review and comment.

**PROJECT NAME:** Brown Field Municipal Airport Master Plan  
**COMMUNITY PLAN AREA:** Otay Mesa  
**COUNCIL DISTRICT:** District 8

**PROJECT DESCRIPTION:** The City of San Diego owns and operates the Brown Field Municipal Airport (SDM) as a General Aviation (GA) airport located within the Otay Mesa community north of Otay Mesa Road, east of Heritage Road, south of Pogo Row, and west of La Media Road (Attachment 1, *Project Location*). Airport planning occurs at the national, state, regional, and local level; and in 2017, the City began developing an Airport Master Plan (Project) to determine the extent, type, and schedule of development needed. An Airport Master Plan presents the community and airport's vision for a 20-year strategic development plan based on the forecast of activity. It is used as a decision-making tool and is intended to complement other local and regional plans. The Airport Master Plan consists of a report documenting existing conditions of the airport, a

forecast of activity, facility requirements (the airport's needs based on the forecast and compliance with Federal Aviation Administration (FAA) Design Standards for airports), development and evaluation of alternatives to meet those needs, and a funding plan for that development. The Airport Master Plan also includes an Airport Layout Plan (ALP) which graphically depicts all planned development at the airport within the 20-year planning period as determined in the Airport Master Plan. This drawing requires approval by the FAA, which makes the airport eligible to receive federal funding for airport improvements and maintenance under the FAA's Airport Improvement Program.

As shown on Attachment 2, *Proposed Airport Plan*, the Project would involve both landside and airside components. Much of Brown Field has been leased by the City to the proposed developers of the Metropolitan Airpark Project (MAP), a project which was reviewed previously in a separate EIR (SCH No. 2010071054) and is not part of the scope of this PEIR. The primary landside improvement to be covered by the Airport Master Plan PEIR is a new 14,000 square foot (sf) terminal building. The preferred method of accomplishing this is to demolish the existing building; but retain/move the existing historic control tower. Note that the proposed new Customs facility has received a CEQA exemption and is not part of this Project. The Proposed Airport Plan (Attachment 2) shows construction of up to 87 new hangars (111,000 sf); however, the hangars would not be developed by the City until there is sufficient demand, and net demand may be affected by how fast MAP is developed. An aircraft wash rack is proposed within the hangar site as well as approximately 65 new automobile parking spaces which are intended to compensate for the loss of a parking area off the west end of the runway apron as a result of proposed Airport Master Plan improvements.

Airside improvements proposed at Brown Field, as shown on Attachment 2, include a new runup pad (which is currently lacking for the smaller runway), and would reconfigure several taxiways to bring them into compliance with current FAA design standards.

**APPLICANT:** City of San Diego, Airports Division

**RECOMMENDED FINDING:** Pursuant to Section 15060(d) of the CEQA Guidelines, the proposed project may result in significant environmental impacts in the following areas: **Air Quality, Biological Resources, Energy Conservation, Geology and Soils, Greenhouse Gas Emissions, Historical Resources (Built-Environment, Archaeology, and Tribal Cultural Resources), Health and Safety, Hydrology and Water Quality, Land Use, Noise, Paleontological Resources, Transportation/Circulation, and Visual Effects and Neighborhood Character.**

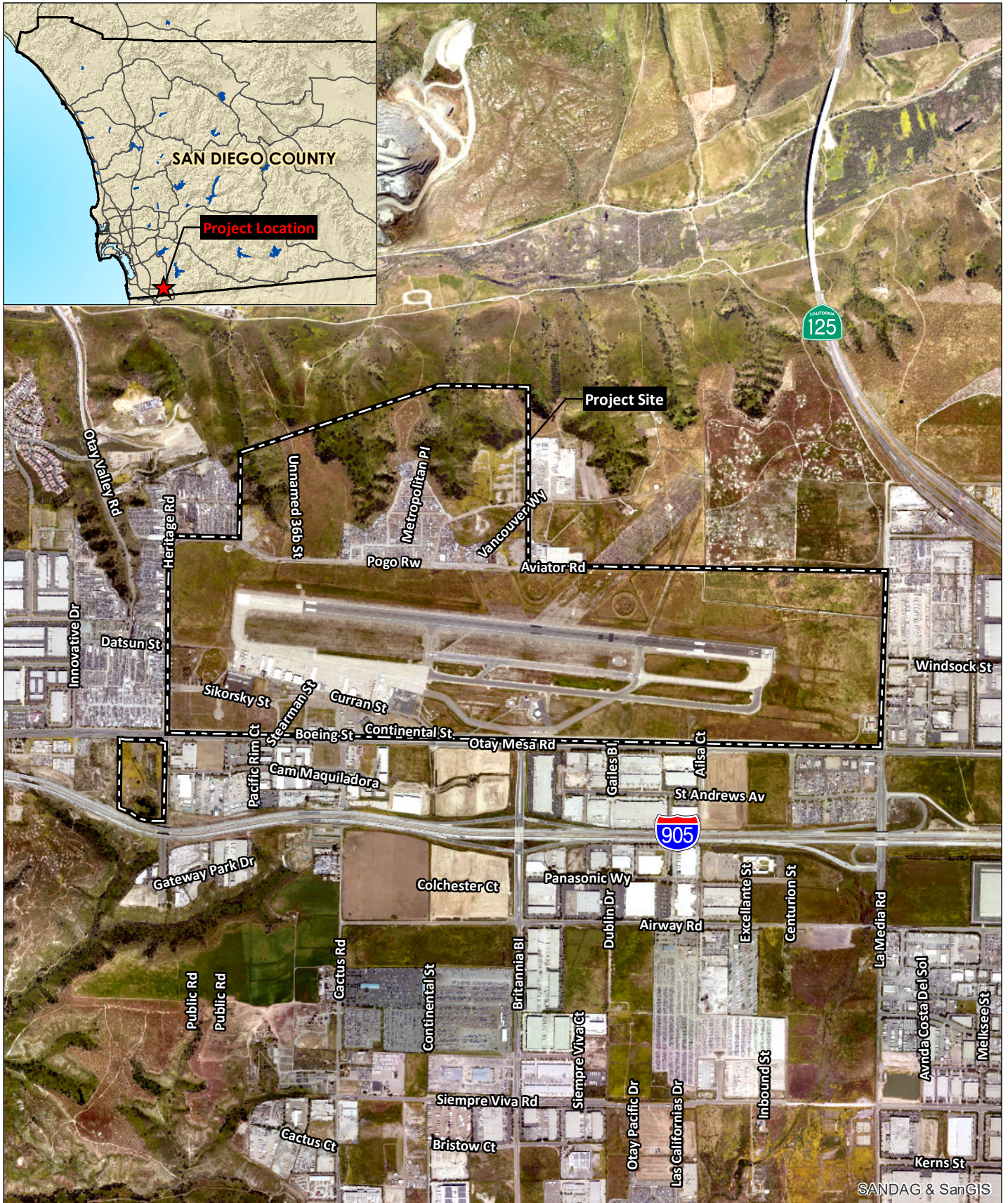
**AVAILABILITY IN ALTERNATIVE FORMAT:** To request this Notice in alternative format, call the Planning Department at (619) 235-5200 OR (800) 735-2929 (TEXT TELEPHONE).

**ADDITIONAL INFORMATION:** For environmental review information, contact Rebecca Malone at (619) 446-5371. For information regarding public meetings/hearings on this project, contact the Airport Program Manager, Wayne Reiter, at (858) 573-1436. This Notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on February 7, 2019.

Alyssa Muto  
Deputy Director  
Planning Department

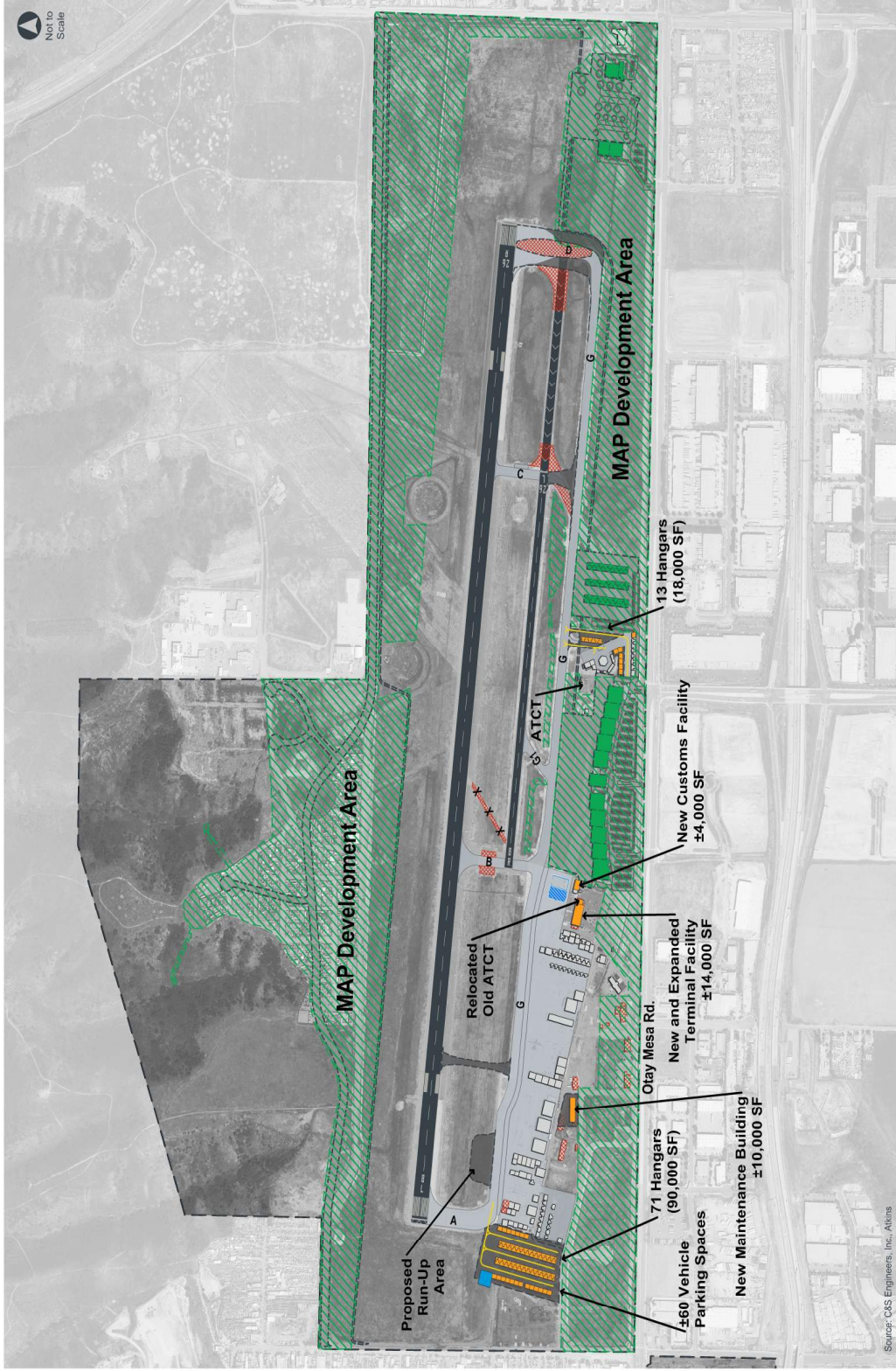
**DISTRIBUTION:** See Attached

**ATTACHMENTS:** Project Location (Attachment 1)  
Proposed Airport Plan (Attachment 2)





- Legend**
- Property Line
  - Existing Buildings
  - Proposed Buildings
  - Existing Airfield Pavement
  - Proposed Pavement
  - MAP Development Area
  - Proposed MAP Buildings
  - Proposed Demolition
  - Proposed Taxiway/Taxilant Centerline
  - Proposed Wash Rack
  - Existing Customs Box
  - Proposed Customs Box Expansion



Source: C&S Engineers, Inc., Atkins

Source: C&S Companies 2018

**Proposed Airport Plan**  
Figure 2

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
PHONE (619) 688-6075  
FAX (619) 688-4299  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

March 8, 2019

11-SD-905  
PM 8.7  
Brown Field Municipal Airport EIR  
NOP/SCH#2019029037

Ms. Rebecca Malone  
City of San Diego  
9485 Aero Drive, MS 413  
San Diego, CA 92123

Dear Ms. Rebecca Malone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the preparation of the Brown Field Municipal Airport Master Plan EIR located near State Route (SR-905). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

**Traffic Impact Study**

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

- Please include ramp intersections at SR-905/ La Media Road and SR-905/ Britannia Boulevard. The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity.

- In addition, the TIS could also consider implementing vehicles miles traveled (VMT) analysis into their modeling projections.
- Any increase in goods movement operations and its impacts to State highway facilities should be addressed in the TIS.
- The data used in the TIS should not be more than 2 years old.

### **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Diego, is encouraged.

The outside shoulders of SR-125 between Birch Road and Otay Mesa Road are opened to bicycle travel. Otay Mesa Road as well as segments of La Media, Britannia, and Semper Viva Roads have segments of either Class II or Class III bikeways. Several regional bus routes that serve this area have bus service throughout Otay Mesa, as well. Caltrans encourages the continued support of integrating access to these facilities during the development of this project.

### **Mitigation**

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS/TIA. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Ms. Rebecca Malone  
March 8, 2019  
Page 3

**Right-of-Way**

Please coordinate with Caltrans for any development on the project parcel (APN 6450901600) identified in figure 1, North of SR-905 at Heritage Road. Please clarify if this area will be developed within this master plan.

Any work performed within Caltrans' right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. Early coordination with Caltrans is recommended.

If you have any questions, please contact Roger Sanchez, of the Caltrans Development Review Branch, at (619) 688-6494 or by e-mail sent to [roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov).

Sincerely,



MELINA PEREIRA, Acting Branch Chief  
Local Development and Intergovernmental Review Branch

NATIVE AMERICAN HERITAGE COMMISSION  
Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691 Phone (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>  
Twitter: @CA\_NAHC



March 6, 2019

Rebecca Malone  
City of San Diego  
9485 Aero Drive, MS 413  
San Diego, CA 92123

RE: SCH# 2019029037 Brown Field Municipal Airport Master Plan Program EIR, San Diego County.

Dear Ms. Malone:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**



AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email

address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for Steven Quinn  
Associate Governmental Program Analyst

cc: State Clearinghouse



# County of San Diego

MARK WARDLAW  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
(858) 694-2962 • Fax (858) 694-2555  
[www.sdcounty.ca.gov/pds](http://www.sdcounty.ca.gov/pds)

KATHLEEN A. FLANNERY  
ASSISTANT DIRECTOR

March 8, 2019

Rebecca Malone  
Environmental Planner  
City of San Diego Planning Department  
9485 Aero Drive, MS 413  
San Diego, CA 92123

Via e-mail to: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

## REQUEST FOR COMMENTS ON THE BROWN FIELD MUNICIPAL AIRPORT MASTER PLAN FOR THE CITY OF SAN DIEGO

Dear Ms. Malone,

The County of San Diego (County) reviewed the City of San Diego's (City) Brown Field Municipal Airport Master Plan (Project), dated February 7, 2019.

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

### PARKS AND RECREATION

The County of San Diego Department of Parks and Recreation (DPR) submits the following comments in response to the Notice of Preparation for the Program Environmental Impact Report (PEIR) for the Brown Field Municipal Airport Master Plan (BFAMP).

1. The County has developed Guidelines for Determining Significance that are used to determine impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the County. Project impacts that could have potentially significant adverse effects to adjacent County facilities, including the Otay Ranch Preserve and Otay Valley Regional Park (OVRP), should evaluate and mitigate environmental impacts using these guidelines. The guidelines are available at the following link: <https://www.sandiegocounty.gov/content/sdc/pds/procguid.html>
2. The proposed BFAMP Project area is directly adjacent to the Otay Ranch Preserve (Preserve). The Preserve is a hard-line preserve that includes over 11,000 acres to be set-aside as mitigation for impacts to sensitive resources resulting from Otay Ranch development that will occur both within the County of and the City of Chula Vista. The BFAMP Project area is immediately adjacent to the Otay Ranch Preserve and conserved properties under existing Preserve Owner Manager management and monitoring, therefore the PEIR needs to include analysis demonstrating compliance with Section 6.4.1 Adjacency

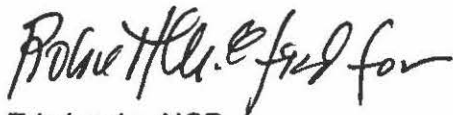
Guidelines of the recently updated *Otay Ranch Phase 2 Resource Management Plan Update* which is available for reference at the following link:

[https://www.sandiegocounty.gov/content/dam/sdparks/en/pdf/Resource-Management/OtayRanch\\_RMP2Update\\_FINAL%20Compiled.pdf](https://www.sandiegocounty.gov/content/dam/sdparks/en/pdf/Resource-Management/OtayRanch_RMP2Update_FINAL%20Compiled.pdf)

3. The City Multiple Species Conservation Program Subarea Plan (MSCP) also includes Adjacency Guidelines that need to be analyzed in the PEIR.
4. The OVRP was established in 1990 to manage multi-jurisdictional planning efforts in the Otay River Valley and is managed by a Joint Excise of Powers Agreement (JEPA) that implements planning, acquisition, and design efforts for the OVRP. A concept plan for the OVRP was updated in 2016 to guide future development and growth of the OVRP. The boundaries of the OVRP are located to the north of the BFAMP Project area. However, potential significant environmental impacts listed in the Notice of Preparation for the BFAMP and PEIR, including Air Quality, Biological Resources, Geology and Soils, Greenhouse Gas Emissions, Historical Resources, Health and Safety, Hydrology and Water Quality, Land Use, Noise, Transportation/Circulation, and Visual Effects and Neighborhood Character have the potential to impact sensitive resources and future recreational resources in the OVRP. DPR recommends that the PEIR analyze any potential future and cumulative impacts to biological and recreational resources in the OVRP. The concept plan is available at the following link: <http://www.sdparks.org/content/dam/sdparks/en/pdf/Development/OVRP%20Concept%20Plan%20Signed.pdf>

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at [timothy.vertino@sdcounty.ca.gov](mailto:timothy.vertino@sdcounty.ca.gov).

Sincerely,



Eric Lardy, AICP  
Chief (Acting), Advance Planning Division  
Planning & Development Services

E-mail cc: Victor Avina, Policy Advisor, Board of Supervisors, District 1  
Mel Millstein, Group Program Manager, LUEG  
Lara Barrett, CAO Staff Officer, LUEG  
Marcus Lubich, Sr. Park Project Manager, DPR  
Emmet Aquino, Park Project Manager, DPR  
Josh Bugiel, Program Coordinator, DPR  
Melanie Tylke, Land Use / Environmental Planner, DPR  
John Holder, Land Use / Environmental Planner, DPR



U.S. FISH AND WILDLIFE SERVICE  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF  
FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, California 92123

In Reply Refer to:  
FWS/CDFW-SDG-09B0378-19TA0604

March 8, 2019  
*Sent by Email*

Ms. Rebecca Malone  
Environmental Planner  
City of San Diego  
9485 Aero Drive, MS 413  
San Diego, CA 92123

**Subject:** Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Brown Field Airport Master Plan, City of San Diego

Dear Ms. Malone:

The U.S Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the Notice of Preparation (NOP) dated February 7, 2019, for a draft Program Environmental Impact Report (DPEIR) for the Brown Field Airport Master Plan (AMP). The project details and comments provided herein (Appendix) are based on the information provided in the NOP, our knowledge of the sensitive biological resources on the Brown Field Airport and surrounding region, and our participation in the Multiple Species Conservation Program (MSCP) and the City of San Diego's (City) MSCP Subarea Plan (SAP) and Vernal Pool Habitat Conservation Plan (VPHCP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCPs) developed under section 10(a)(1) of the Act.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) Program. The City is participating in the Department's NCCP and the Service's HCP programs through implementation of its SAP and VPHCP.

The project area is located within the Otay Mesa community north of Otay Mesa Road, east of Heritage Road, south of Pogo Row, and west of La Media Road. The City has been developing an AMP to determine the extent, type and schedule of development for the next 20 years. The AMP will document existing conditions of the airport, forecast future activity and facility requirements (the

airport's needs based on the forecast and compliance with Federal Aviation Administration (FAA) Design Standards for airports) and a funding plan for that development. In addition, the AMP includes an Airport Layout Plan (ALP) which graphically depicts all planned development at the airport within the 20-year planning period as determined in the AMP. This depiction requires approval by the FAA, which makes the airport eligible to receive federal funding for airport improvements and maintenance under the FAA's Airport Improvement Program.

The Brown Field Airport property supports the following federally and/or state listed or species of special concern which are also covered species under the City's SAP or VPHCP: San Diego fairy shrimp (*Branchinecta sandiegonensis*), Riverside fairy shrimp (*Streptocephalus woottoni*) and western burrowing owl (*Athene cunicularia hypugaea*). In addition, designated critical habitat for Otay tarplant (*Deinandra conjugens*), spreading navarretia (*Navarretia fossalis*), and quino checkerspot butterfly (*Euphydryas editha quino*) is adjacent to the airport property.

Overall, the AMP should be consistent with the City's SAP and VPHCP and the DPEIR should include an evaluation of consistency with these plans. Impacts to covered species may be authorized under the City's SAP and VPHCP if the AMP is consistent with these plans.

We offer the additional enclosed comments to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with its SAP and VPHCP.

We appreciate the opportunity to comment on the subject NOP and look forward to further coordination on the AMP. Should you have any questions regarding this letter, please contact Patrick Tilley of the Department at 858-467-4237 or Patrick Gower of this office at 760-431-9440, extension 274.

Sincerely,



for: Karen A. Goebel  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

Gail K. Sevrens  
Environmental Program Manager  
California Department of Fish and Wildlife

cc: State Clearinghouse, Sacramento



**Appendix**  
**Comments and Recommendations on the**  
**Notice of Preparation of a Draft Programmatic Environmental Impact Report**  
**For the Brown Field Airport Master Plan**

**Specific Comments**

1. We recommend the City of San Diego (City) coordinate with the Wildlife Agencies and the Federal Aviation Administration to ensure that project mitigation occurs on site as much as possible consistent with the City's Multiple Species Conservation Program Subarea Plan and Vernal Pool Habitat Conservation Plan.

**General Comments**

To enable us to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the Draft Environmental Impact Report (DPEIR):

1. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
2. A complete list and assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying State or federally listed rare, threatened, endangered, or proposed candidate species, California Species-of-Special Concern and/or State Protected or Fully Protected species, and any locally unique species and sensitive habitats. Specifically, the DPEIR should include:
  - a. A thorough assessment of Rare Natural Communities on site and within the area of impact. We recommend following the California Department of Fish and Wildlife's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.
  - b. A current inventory of the biological resources associated with each habitat type on site and within the area of impact.
  - c. An inventory of rare, threatened, and endangered species on site and within the area of impact.
  - d. Discussions regarding seasonal variations in use by sensitive species of the project site as well as the area of impact on those species, using acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
3. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DPEIR should provide:

- a. Specific acreage and descriptions of the types of wetlands, coastal sage scrub, and other sensitive habitats that will or may be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.
  - b. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.
  - c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.
  - d. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed NCCP reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
  - e. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
  - f. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.
  - g. An analysis of the effect that the project may have on implementation of regional and/or subregional conservation programs. We recommend that the Lead Agency ensure that the development of this and other proposed projects do not interfere with the goals and objectives of established or planned long-term preserves and that projects conform with other requirements of the NCCP program.
4. Mitigation measures for unavoidable adverse project-related impacts on sensitive plants, animals, and habitats should be consistent with the MSCP and/or Vernal Pool HCP, as applicable. Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. For unavoidable impacts, off-site mitigation

through acquisition and preservation in perpetuity of the affected habitats should be addressed. We generally do not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful

5. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

**From:** Phoebe Puerner  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** Scoping plan  
**Date:** Tuesday, February 12, 2019 10:19:58 AM

---

Hi this is phoebe,

I'm a resident here in San Diego County and I'm not quite sure what input I'm supposed to say but for the list

- Air Quality
- Biological Resources
- Energy Conservation
- Geology and Soils
- Greenhouse Gas Emissions
- Health and Safety
- Hydrology and Water Quality
- Land Use
- Noise
- Paleontological Resources
- Public Services and Facilities
- Public Utilities
- Transportation/Circulation
- No "too fast construction"
- Animal conservation

I personally and many others would like them to have to check these before building goes further with the airports.



Save Our Heritage Organisation  
Protecting San Diego's architectural and cultural heritage since 1969

Friday, March 8, 2019

Rebecca Malone, Environmental Planner  
City of San Diego Planning Department  
9485 Aero Drive, MS 413  
San Diego, CA 92123

Re: Brown Field Municipal Airport Master Plan

Ms. Malone,

Save Our Heritage Organisation (SOHO) acknowledges that the City of San Diego is moving forward in developing a Brown Field Municipal Airport Master Plan and has issued a Notice of Preparation to solicit comments. Similar to the Montgomery-Gibbs Airport Master Plan, a public viewing area should be added to the Brown Field plan and scope, as this is an important method to ensure future public interest and an understanding of aviation. Also, due to the historical use of the site including the navy, SOHO looks forward to reviewing the evaluation report for the historic resources on this site.

Thank you for the opportunity to comment,

Bruce Coons  
Executive Director  
Save Our Heritage Organisation



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

**Notice of Preparation**

February 7, 2019

To: Reviewing Agencies  
Re: Brown Field Municipal Airport Master Plan Program EIR  
SCH# 2019029037

Attached for your review and comment is the Notice of Preparation (NOP) for the Brown Field Municipal Airport Master Plan Program EIR draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Rebecca Malone**  
City of San Diego  
9485 Aero Drive, MS 413  
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency



# San Diego County Archaeological Society, Inc.

Environmental Review Committee

10 March 2019

To: Ms. Rebecca Malone  
Planning Department  
City of San Diego  
9485 Aero Drive, MS 413  
San Diego, California 92123

Subject: Notice of Preparation of a Draft Program Environmental Impact Report  
Brown Field Municipal Airport Master Plan


Dear Ms. Malone:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File